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HENRY UNSELD WASHINGTON

AUG - 8 2016

ERK, U.S. DISTRICT COURT  
W.D. OF PENNSYLVANIA

IN THE UNITED STATES DISTRICT COURT

FOR THE WESTERN DISTRICT OF PENNSYLVANIA

HENRY UNSELD WASHINGTON  
PLAINTIFF  
v.

CIVIL ACTION NO. 2:15-CV-1031  
LISA PUPO LENIHAN

ROBERT D. GILMORE, MS. T. SHAWLEY, } AMENDED COMPLAINT  
S. P. DURCO, P.E. BARKEFELT, A.J. MORRIS, }  
C. WILLIAMS, G. CRABLE, J. M. SMITH, ROBERT NELSON, T.S. OSWALD, T. I.  
BENNETT, L. COMER, R. HENDRICKS, J. COPPY, J. HEGETER, O. FARRIER, M.  
STUMP, B. TAIT, J. D. SUHAN, IRMA VIHLIDAL, B. JIN, M. PARK, P. DASCANI,  
M. COMER, E. MATTES, E. MWaura, P. DENNISON, DEFENDANTS

### PLAINTIFF MOTION TO AMEND COMPLAINT

PLAINTIFF WASHINGTON HEREBY MOVES THIS HONORABLE COURT FOR  
LEAVE TO AMEND ITS COMPLAINT PURSUANT TO F.R.C.P. 15(a)(2) IN ORDER TO MORE  
DEFINE STATEMENTS, AND BETTER ARTICULATE PLAINTIFF COMPLAINT. THIS Doc-  
UMENT SHOULD HEREBY SERVE AS THE PRIMARY CAUSE OF ACTION SOUGHT THROUGH  
THIS ACTION BY PLAINTIFF.

#### I. INTRODUCTION

1. HENRY UNSELD WASHINGTON BRINGS THIS ACTION, CHARGING THAT THE PENN-  
SYLVANIA DEPARTMENT OF CORRECT AND MANY OF ITS AFFILIATES AND OFFICERS LOC-

ATED STATEWIDE AND AT SCI-<sup>GREENE</sup> (DEFENDANTS") PERMITTED AND ENCOURAGED  
UNLAWFUL RETALIATION AGAINST WASHINGTON FOR HIS BRINING LEGAL ACTION  
IN RESPONSE TO VIOLATIONS OF HIS CIVIL RIGHTS

2. ADDITIONALLY, WASHINGTON ALLEGES THAT DEFENDANTS FAILED TO PROTECT HIM  
FROM PHYSICAL AND SEXUAL ASSAULT, SEXUAL HARASSMENT, AND  
PERMITTED, ENCOURAGED, AND ENGAGED IN-DIRECTLY AND THROUGH NON-ACTION  
—SEXUAL AND PHYSICAL ASSAULT, AND SEXUAL HARASSMENT. FINALLY, PLAINT-  
IFF ALLEGES THAT DEFENDANTS DENIED HIM NECESSARY HEALTH CARE SERVICES.  
AMENDED COMPLAINT: 2:15-CV-1031 (1)

## LIST OF DEFENDANTS

N.B. ALL DEFENDANTS ARE EMPLOYED AT SCI-GREENE, 175 PROGRESS DRIVE, WAYNESBURG, PA. 15370-8082

NO.	NAME	JOB TITLE
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1.	ROBERT D. GILMORE	WARDEN
2.	MS. TRACY SHAWLEY	WARDEN'S ASSISTANT
3.	STEPHEN P. DURCO	RHU COMMANDER
4.	PAUL E BARKEFELT	RHU LIEUTENANT
5.	ALAN J. MORRIS	RHU LIEUTENANT
6.	CORY WILLIAMS	RHU LIEUTENANT
7.	GARY CRABLE	G BLOCK SERGEANT
8.	JUSTIN M. SMITH	G BLOCK SERGEANT
9.	ROBERT NELSON	CORRECTIONS OFFICER
10.	TIMOTHY S. OSWALD	CORRECTIONS OFFICER
11.	LEWIS COMER	CORRECTIONS OFFICER
12.	ROBERT HENDRICKS	CORRECTIONS OFFICER
13.	JASON CODDY	CORRECTIONS OFFICER
14.	JAVAN HEGETER	CORRECTIONS OFFICER
15.	DAVID FARRIER	CORRECTIONS OFFICER
16.	MICHAEL STUMP	CORRECTIONS OFFICER
17.	MS. GAIL TAIT	CORRECTIONS OFFICER
18.	JONATHAN D. SUHAN	CORRECTIONS OFFICER
19.	PATRICK DENNISON	CORRECTIONS OFFICER
20.	THOMAS I. BENNETT	CORRECTIONS OFFICER
21.	IRMA VIHLIDAL	HEALTH CARE ADMINISTRATOR
22.	BYUNGHAK JIN	MEDICAL DIRECTOR
23.	MIN PARK	DOCTOR
24.	PAUL DASCANI	DOCTOR

AMENDED COMPLAINT

(I)

2:15-cv-1031

## LIST OF DEFENDANTS

NO.	NAME	TITLE
25.	Ms. MARY COMER	PHYSICIAN'S ASSISTANT: PACS
26.	MS. ESTHER MATTES	PHYSICIANS' ASSISTANT: PACS
27.	MS. ELON MWaura	PHYSICIANS' ASSISTANT: PACS

3. WASHINGTON HAS EXHAUSTED ALL AVAILABLE REMEDIES; A COPY OF THOSE GRIEVANCES THAT WERE ALLOWED TO GO FORWARD ARE LOCATED IN THE APPENDIX, DEFENDANTS CONTINUOUSLY COMMANDEERED, PLAINTIFF TIMELY SUBMITTED GRIEVANCES, AND NEVER RESPONDED THOSE GRIEVANCES, THEREFORE, PLAINTIFF EXHAUSTED ALL REMEDIES AVAILABLE; SO IF THERE'S NO COPY OF A GRIEVANCE CONCERNING A ISSUE THAT'S BECAUSE DEFENDANTS DENIED PLAINTIFF ACCESS, AND THIS THROUGH THE COURT IS PLAINTIFF ONLY AVENUE FOR AN ADEQUATE REMEDY

## II. JURISDICTION

4. THIS CIVIL ACTION AUTHORIZED BY 42 U.S.C. SECTION 1983 TO REDRESS THE DEPRIVATION, UNDER COLOR OF STATE LAW, OF RIGHTS SECURED BY THE CONSTITUTION OF THE UNITED STATES, THE COURT HAS JURISDICTION UNDER 28 U.S.C. SECTION 1331 AND 1343(a)(3)

5. THE WESTERN DISTRICT OF PENNSYLVANIA IS AN APPROPRIATE VENUE UNDER 28 U.S.C. SECTION 1331(b)(2) BECAUSE IT IS WHERE THE EVENTS GIVING RISE TO THIS CLAIM OCCURRED.

## III. PARTIES

6. PLAINTIFF, HENRY UNSELD WASHINGTON IS A DARK SKIN BLACK ADULT MALE WHO IS CURRENTLY RESIDING AT THE STATE CORRECTION AT SCI-SOMERSET IN SOMERSET COUNTY, PENNSYLVANIA

7. DEFENDANTS ARE EMPLOYEES OF THE PENNSYLVANIA DEPARTMENT OF CORRECTIONS AT SCI-GREENE COUNTY, PENNSYLVANIA AND OFFICIALS WITHIN THE PENNSYLVANIA DEPARTMENT OF CORRECTIONS AND OFFICE OF PRISON MANAGEMENT

## IV. FACTS

8. PLAINTIFF, WASHINGTON WAS FIRST INCARCERATED IN PENNSYLVANIA IN 1980 AND WAS FIRST HELD AT SCI-DALLAS, IN 1994 HE WAS MOVED TO SCI-GREENE

9. DURING THIS TIME, HE HAD HIS FIRST PROBLEMS WITH A GROUP OF GUARDS THAT LED TO ON GOING PROBLEMS WITH PRISON AUTHORITIES.

10. WASHINGTON WAS TRANSFERRED OUT OF SCI-GREENE IN 1997, RETURNED IN 2009

11. THE STAFF OF SCI-GREEN WERE AWARE THAT WASHINGTON HAS ON GOING LITIGATION AGAINST PRISON OFFICIALS, e.g. WASHINGTON V. FOLINO, 2:11-cv-1046, FILED 2011, AMENDED COMPLAINT: 2:15-cv-1031.

WASHINGTON V. FOLINO, NO. A.D. 644 2014; FILED IN 2014; WASHINGTON V. GRACE, 455 F. APPX 166 (3rd Cir 2011) FILED 2008; WASHINGTON V. KLEM, 497 F.3d 272 (3rd Cir. 2007) FILED 2001; THE LATTER OF THESE IS A DEPRIVATION OF RELIGIOUS PRACTICE. GUARDS AT SCI-GREENE WERE AWARE OF ALL OF THESE PIECES OF LITIGATIONS

12. THE ONGOING PROBLEMS WITH PRISON AUTHORITIES DEVELOPED OUT OF A SOFTBALL GAME BETWEEN PRISONERS AND GUARDS, WHICH WASHINGTON UMPIRED, THE PRISONERS WON THE GAME AND GUARDS RESPONDED THROUGH PHYSICAL ABUSE OF WASHINGTON. PRIOR TO THIS INCIDENT, FOR OVER FIFTEEN YEARS, WASHINGTON WAS A GOOD PRISONER WITH ONLY MINOR MISCONDUCT ON HIS DISCIPLINARY RECORD

13. WASHINGTON IS DEFINED AS A "PAPER PUSHER" BY GUARDS AND STAFF AT SCI-GREENE, THEY RESPONDED TO HIM WITH THIS IN MIND AND HAVE RETALIATED AGAINST HIM FOR FILING LITIGATIONS AGAINST PRISON OFFICIALS.

14. IN THE COURSE OF THESE ACTIONS INCLUDING DEFENDANTS B. JIN, OSWALD, NELSON, STUMP, BENNETTE, AND M. PARK, STATED THAT THEIR ACTIONS WERE IN RESPONSE TO WASHINGTON "TALKING TO AUTHORITIES" AND "SUING US". THESE OFFICIALS OFTEN STATED THEY WERE WORKING UNDER THE DIRECT ORDERS OF THEIR SUPERVISORS IN CONNECTIONS TO WASHINGTON'S ON-GOING LITIGATION. ONE PRISON OFFICIAL, J. HEGETER STATED, "YOU'RE SUING US, WHAT DO YOU EXPECT?" ATTACHED ■. THE PHRASE "STAFF FAMILY", "WHEN PLAINTIFF SUED ONE HE SUED THEM, TOO", AND "PENALIZE PLAINTIFF" "YOU'RE SUING MY FAMILY, HE'S ONLY PROTECTING FAMILY"

15. THE PRESENT ACTIONS TAKEN AGAINST WASHINGTON OCCURRED ONLY AFTER HE PURSUED LEGAL ACTIONS, GRIEVANCES AND COMPLAINTS OF VARIOUS CONCERNES HE HAD, INCLUDING FILING A LEGAL ACTION FOR ACCESS TO HIS PERSONAL PROPERTY THAT WAS NECESSARY FOR HIS RELIGIOUS PRACTICE IN WASHINGTON V. KLEM.

(16). PRISON OFFICIALS, R. NELSON - N-T.S. OSWALD, M. STUMP, DAVID FARRIER, J.D., SUHAN, J.M. SMITH AND MEDICAL PROFESSIONALS B. JIN - N- P. DASCANI HAVE SEXUALLY ASSAULTED, AND SEXUALLY HARASSED WASHINGTON NUMEROUS TIMES, DURING REQUEST FOR MEDICAL SERVICE, AND ESCORTING PLAINTIFF

(17). PRISON OFFICIALS, AND MEDICAL PROFESSIONALS MADE SEXUAL AND LEWD AMENDED COMPLAINT: 2:15-cv-1031 (3)

COMMENTS TOWARDS WASHINGTON IN EFFORT TO EMBARRASS, HARASS-N-HUMILIATE HIM. FOR EXAMPLE, DR. JIN SAID TO WASHINGTON IN 2013, DURING AN INSTANCE WHEN WASHINGTON WAS EXPERIENCING CLASSIC HEART ATTACK SYMPTOMS "WHAT YOU NEED IS A GOOD SCREWING"

- (18) PRISON OFFICIALS, INCLUDING DEFENDANT, T.S. OSWALD, R. NELSON, M. STUMP-N-D. FARRER HAVE ENGAGED IN UNWANTED TOUCHING AND BANTER FOR A SEXUAL NATURE TOWARDS WASHINGTON INCLUDING LEAVING WASHINGTON NUDE-N-SPRAWLED OUT ON THE FLOOR IN NEED OF IMMEDIATE MEDICAL CARE, LAUGHING AS THEY WALKED AWAY
- (19) WHILE ESCORTING PLAINTIFF TO HIS CELL, OFFICER OSWALD, HAS RUBBED WASHINGTON BUTTOCK IN AN UNWELCOME WAY AND MADE LEWD MOANING SOUNDS IN WASHINGTON'S EAR, SIMULATING AN ORGASM.
- (20) DURING SICK CALL, DR. P. DASCANI, WHILE WASHINGTON WAS EXPERIENCING EMERGENCY MEDICAL NEEDS, DR. DASCANI REQUESTED SEX, DESPITE WASHINGTON BEGGING FOR MEDICAL CARE.
- (21) WASHINGTON SUFFERS FROM A VARIETY OF MEDICAL CONDITIONS, e.g., WHIPPLE'S DISEASE, DEMENTIA, DAMAGE VOCAL CORDS, URETHRAL STRICTURE, IRREVERSIBLE FOOT FUNGUS, TESTOSTERONE DEFICIENCY, CHRONIC FATIGUE-N-DIFFICULTY CONCENTRATING, GOING BLIND IN RIGHT EYE. ACCORDING TO PRISON OFFICIALS, HE HAS EXPERIENCED AT LEAST TWO HEART ATTACKS, DРИPPING SEMEN, etc.
- (22) OVER THE PAST SIX YEARS, WASHINGTON HAS EXPERIENCED SUBSTANTIAL AND RADICAL WEIGHT LOSS AS A RESULT OF HIS ONGOING FAILING HEALTH, ISSUES.
- (23) PRISON DOCTORS-N-MEDICAL PROFESSIONALS ACKNOWLEDGED WASHINGTON HEALTH NEEDS AND BLATANTLY CHOSE TO IGNORE THEM. ONE PRISON DOCTOR TOLD WASHINGTON DIRECTLY THAT HE IS NOT GOING TO WASTE TIME ON HELPING HIM.
- (24) DR. JIN, A PRISON DOCTOR, HAS HAD SEVERAL ISSUES WITH WASHINGTON IN THE PAST, INSISTS ON BEING THE ONLY DOCTOR TO RESPOND TO ALL OF WASHINGTON'S REQUESTS FOR MEDICAL ASSISTANCE, DESPITE WASHINTON'S REQUEST THAT HE NOT. MORE THAN ONCE HE HAS SEXUALLY AND PHYSICALLY ASSAULTED AND SEXUALLY HARASSED WASHINGTON. OTHER PRISONERS IN SOLITARY CONFINEMENT WERE TREATED BY MEDICAL STAFF

OTHER THAN DR. JIN-N-DR. PARK UPON REQUEST, BUT WASHINGTON'S REQUEST IS ROUTINELY DENIED.

(25) MEDICAL PROFESSIONALS, DEFENDANTS, JIN, PARK, DASCANI, COMER, MATTES-N-MWAURA INFORMED WASHINGTON THAT SUING PRISON'S MEDICAL PROFESSIONALS PERSONALLY MEANS HE WILL NOT BE HELPED WITH HIS MEDICAL CONDITIONS, THE ONE MEDICAL PROFESSIONAL WHO ATTEMPTED TO ASSIST WASHINGTON WITH HIS MEDICAL NEEDS, MS. JENNIFER ~~TRIM~~ TRIM-AI, WERE KEPT AWAY FROM WASHINGTON BY DEFENDANTS, DR. JIN-N-DR. PARK; AND UP-ON INFORMATION-N-BELIEF, ALSO DEFENDANT, GILMORE

(26) WASHINGTON HAS NEVER BEEN DISCIPLINED FOR VIOLENT BEHAVIOR, DRUGS OR ANY OTHER SERIOUS CHARGE, NOR HAS HE EVER BEEN TRANSFERRED AS A RESULT OF A DISCIPLINARY ACTION.

(27) OUTSIDE OF STAFF'S POTENTIAL PERCEPTION OF WASHINGTON'S PURUANT OF JUSTICE FOR ALLEGED VIOLATIONS OF HIS CIVIL RIGHTS, WASHINGTON HAS BEEN A MODEL PRISONER THE 30-PLUS YEARS OF HIS INCARCERATION WITH LIMITED WITNESS-UUPS

(28) DESPITE PLAINTIFF'S EXCELLENT PRISON RECORD WITH NO SIGNIFICANT DISCIPLINARY VIOLATIONS, WARDEN GILMORE NONTHELESS KEPT WASHINGTON IN SOLITARY CONFINEMENT AT SCI-GREENE IN RETALIATION FOR WASHINGTON'S LITIGATION ACTIVITIES, WASHINGTON LIVED IN EXTRAORDINARY RESTRICTIVE CONDITIONS OF 23-24 HOURS SOLITARY CONFINEMENT, HE IS NOT PERMITTED TO PARTICIPATE IN ANY PROGRAMMING OR CONGREGATE ACTIVITY

(29) WASHINGTON IS SUBJECT TO SEVERE RESTRICTIONS ON HIS VISITS, PHONE CALLS, PROPERTY-N-CORRESPONDENCE, AND EATS ALL MEALS IN HIS CELL

(30) DURING A FEW SICK CALL RESPONSE, WHILE WASHINGTON WAS EXPERIENCING HEALTH SYMPTOMS THAT WOULD REQUIRE EMERGENCY MEDICAL CARE DEFENDANTS, DR JIN-N-DR. DASCANI INSTRUCTED WASHINGTON TO REMOVE ALL CLOTHING AND DO SEXUAL POSES.

(31) PRISON ADMINISTRATION, INCLUDING DEFENDANT, GILMORE WAS REPEATEDLY ALERTED TO THOSE ON GOING ISSUES, e.g. PLAINTIFF FILING INTERNAL COMPLAINTS THROUGH THE GRIEVANCE SYSTEM; PLAINTIFF VERBALLY INFORMING ADMINISTRATION OF HIS ONGOING CONCERNs AND ASKING THEM TO STOP; THROUGH COMPLAINTS FILED IN FEDERAL COURT THAT OUTLINE PRIOR ISSUES THAT HAVE NEVER BEEN RECTIFIED.

(32) DEFENDANTS, R. GILMORE, T. SHAWLEY, S. P. DURCO, P.E. BARKEFFELT, A.J. MORRIS, AMENDED COMPLAINT 2:15-CV-1031 (5)

C. WILLIAMS, I. VIHLIDAL WERE DIRECTLY INVOLVED IN THESE ON GOING ISSUES THROUGH A LACK OF RESPONSE, PERSONAL PARTICIPATION, AND BLATANT INDIFFERENCE TO WASHINGTON'S PERSONAL AND MENTAL WELL BEING

(33). PRIOR TO APPROXIMATELY AUGUST 2014 SCI-GREENE RHU WAS ABSENT OF WALL CLOCKS; AND INMATES DID NOT HAVE ACCESS TO ANY MEANS OF KNOWING THE CORRECT TIME. CLOCKS WERE INSTALLED ON THE UNIT PLAINTIFF HOUSED LAST, AND ONLY ONE OPERABLE CLOCK WHICH COULD NOT BE SEEN FROM PLAINTIFF CELL; WHAT FOLLOWS IS THAT MADE IT IMPOSSIBLE FOR PLAINTIFF TO BE AWARE OF THE CORRECT TIME; SO FOR THE SAKE OF THIS CLAIM-LEGAL ACTION THE TERM A.M.-N.P.M. WILL BE USED TO DESIGNATE THE TIME

## V. CAUSES OF ACTION (RETALIATION)

(34). PARAGRAPHS 1 THROUGH 33 ARE INCORPORATED BY REFERENCE

(35). THE CONDUCT WHICH LED TO THE RETALIATIONS AGAINST WASHINGTON IS A COMBINATION OF WASHINGTON'S ATTEMPT TO ACCESS THE COURT TO ADJUDICATE ON GOING CIVIL RIGHTS CONCERNs PROTECTED ~~BY~~ UNDER FIRST, EIGHTH, AND FOURTEENTH AMENDMENTS TO THE U.S. CONSTITUTION, AND HIS EFFORTS TO FULLY ENGAGE WITH HIS RELIGIOUS BELIEFS, AS REINFORCED THROUGH A SETTLEMENT AGREEMENT AND PROTECTED UNDER THE FIRST AMENDMENT OF THE U.S. CONSTITUTION

(36). PRISON OFFICIALS AT SCI-GREENE, ALL STATE ACTORS SUBJECTED WASHINGTON TO ADVERSE ACTIONS.

(37). THESE ADVERSE ACTIONS INCLUDED, BUT ARE NOT LIMITED TO, SEXUAL AND PHYSICAL ASSAULT, DENIAL OF MEANINGFUL HEALTH CARE, ACCESS TO COURT, BASELESS DISCIPLINARY WRITELIPS, DEROGATORY AND RACIST LANGUAGE, DENIAL OF LEAST RESTRICTIVE MEANS OF RELIGIOUS PRACTICE, EQUAL PROTECTION.

(38). WASHINGTON'S CONDUCT PURSUING HIS CONSTITUTIONAL RIGHTS WAS REASONABLE.

(39). A REASONABLE PERSON WOULD BE LIKELY TO BE DETERRED FROM PURSUING THEIR RIGHTS UNDER THESE CONDITIONS

(40). THE ACTIONS OF THE PRISON OFFICIALS WERE DIRECTLY IN RESPONSE TO WASHINGTON'S ATTEMPT TO PURSUE HIS CONSTITUTIONAL RIGHTS

(41). A CAUSAL LINK EXISTS BETWEEN WASHINGTON'S PURSUIT OF HIS CONSTITUTIONAL RIGHTS AND THE ADVERSE ACTIONS TAKEN BY PRISON OFFICIALS, AS DEMONSTRATED BY AMENDED COMPLAINT. 2:15-CV-1031

THE PROXIMITY OF THE ACTIONS TO WASHINGTON'S PURSUANT OF HIS RIGHTS AND VERBAL ACKNOWLEDGEMENT BY PRISON OFFICIALS

- (42). AS A RESULT OF DEFENDANTS RETALIATION WASHINGTON'S ABILITY TO ADVANCE HIS CONSTITUTIONAL RIGHTS WAS INHIBITED IN THE FORM OF HIS INABILITY TO FULLY ENGAGE WITH HIS RELIGION, AS WELL AS PURSUE JUSTICE FOR HIS CIVIL RIGHTS VIOLATIONS WITHOUT FEAR OF FURTHER RETALIATION
- (43). RETALIATORY REPORTS LED TO PROLONGED SOLITARY CONFINEMENT, WORSENING WASHINGTON'S HEALTH, CAUSING A SUBSTANTIAL RISK THAT HE WILL BE SUBJECT TO GREATER HARM IN THE FUTURE.
- (44). WASHINGTON EXISTS IN A PERPETUAL CYCLE OF DESIRING TO SEEK A REMEDY TO THE VIOLATIONS OF HIS RIGHTS, AS WELL AS A REMEDY TO HIS IMMEDIATE MEDICAL AND PHYSICAL NEEDS, BUT SEEKING SUCH REMEDIES EXACERBATES THE RETALIATION HE ENDURES AND CAUSES THE PROBLEM TO WORSEN
- (45). IN A PRIOR SETTLEMENT AGREEMENT, PRISON OFFICIALS AGREED TO PROVIDE WASHINGTON WITH RELIGIOUS LITERATURE NEEDED TO CONDUCT THE DAILY RITUALS OF HIS RELIGION.
- (46). PRISON OFFICIALS CONSISTENTLY FAILED TO PROVIDE WASHINGTON WITH ACCESS TO THIS LITERATURE ON A WEEKLY BASIS.
- (47). DESPITE THEIR REQUIREMENTS TO UTILIZE THE LEAST RESTRICTIVE MEANS IN REGARDS TO ANY INFRINGEMENT UPON HIS RELIGIOUS NEEDS, PRISON OFFICIALS BLATANTLY DENIED WASHINGTON ACCESS TO THIS LITERATURE; DUE TO WASHINGTON HAVING SUED SCI-GREENE RHU STAFF, OR 'THEIR FAMILY'; AND WASHINGTON'S COMMUNICATIONS WITH AUTHORITIES
- (48). DEFENDANT, GILMORE, THROUGH HIS ROLE AS WARDEN AND SUPERVISION OF HIS SUBORDINATES, MORE THAN ONCE DENIED WASHINGTON ACCESS TO THE COURTS, WASHINGTON WAS INFORMED BY PRISON OFFICIALS THAT HIS MAIL WAS NOT GOING OUT DUE TO ONGOING LITIGATION HE HAD AGAINST THE OFFICIALS
- (49). ON MORE THAN ONE OCCASION DEFENDANTS, BARKEFELT, DURCO-N-MORRIS, SHOWED UP AT WASHINGTON'S CELL DOOR SEPARATELY WITH A PIECE OF OUT GOING MAIL WASHINGTON HAD PLACED INTO THE OUT GOING MOMENTS EARLIER. THE PRISON OFFICIALS HAVE THEN, ON MORE THAN ONE OCCASION RIPPED THE MAIL INTO PIECES IN FRONT OF WASHINGTON
- (50). WASHINGTON, A INDIGENT INMATE WAS DENIED WRITING PAPER WHICH CAUSED WASHINGTON TO WRITE HIS PLEADING TO WASHINGTON V. FOLINO, 11-1046, IN SMALL PRINT, TWO LINES PER SPACE TO PRESERVE SPACE DUE TO DENIAL OF WRITING PAPER; THIS REASON AMENDED COMPLAINT: 2:15-CV-1031

WAS THE BASIS FOR WASHINGTON'S LEGAL ACTION BEING DISMISSED BY THE DISTRICT COURT - N-THIRD CIRCUIT.

- (51) WASHINGTON'S RIGHTS OF ACCESS TO COURT AND FREE SPEECH WERE STIFLED ON MORE THAN ONE OCCASION IN A VINDICIVE-N-INTENTIONAL WAY BY THE OFFICIALS OF THE STATE.

## VI. RETALIATORY : CRUEL-N-UNUSUAL PUNISHMENT

- (52) PARAGRAPHS 1 THROUGH 51 ARE INCORPORATED BY REFERENCE.
- (53) DEFENDANTS, DIRECTLY AND THROUGH THEIR AGENTS, CONSISTENTLY DENIED WASHINGTON REQUESTED AND NECESSARY EMERGENCY MEDICAL TREATMENT AND HEALTH CARE SERVICES TO WASHINGTON DURING THE TIME IN QUESTION
- (54) WHILE WASHINGTON DID AT TIMES RECEIVE VISITS BY PRISON MEDICAL PROFESSIONALS, THE MEDICAL TREATMENT PROVIDED WAS ILLUSORY AND DID NOT FULFILL THE OBLIGATIONS ESTABLISHED UNDER THE EIGHTH AMENDMENT
- (55) PRISON MEDICAL OFFICIALS HAVE NOT ONLY ACTED IN DELIBERATE INDIFFERENCE TOWARD THE HEALTH NEEDS OF WASHINGTON, BUT HAVE RESPONDED TO HIM WITH DELIBERATE ANIMOSITY BY TELLING HIM THEY WILL NOT WASTE THEIR TIME ON HIM AND ACKNOWLEDGING THAT HIS PURSUIT OF JUSTICE THROUGH THE ADMINISTRATIVE AVENUES OF THE DEPARTMENT OF CORRECTIONS AND JUDICIAL SYSTEM AFFECTS THE LEVEL OF ASSISTANCE ~~THEY GAVE~~ <sup>HIM</sup>
- (56) PRISON OFFICIALS REFUSAL TO INTERVENE AND ENSURE THAT WASHINGTON RECEIVES HIS NECESSARY MEDICAL ATTENTION AMOUNTS TO DELIBERATE INDIFFERENCE
- (57) PRISON OFFICIALS HAVE BEEN DELIBERATELY INDIFFERENT TO THE ON GOING MENTAL-N-PHYSICAL ABUSE WASHINGTON HAD ENDURED, AND THEY FAILED TO INTERVENE TO PROTECT HIM FROM HARM
- (58) DEFENDANTS, GILMORE, SHAWLEY, DURCO, BARKEFELT, MORRIS, VIHLIAL, WERE FULLY AWARE OF THE SEXUAL AND AGGRAVATED ASSAULTS ON WASHINGTON. DESPITE WASHINGTON'S MANY COMPLAINTS ABOUT THESE MATTERS, DEFENDANTS HAVE FAILED TO PUT A STOP TO THESE ABUSES.
- (59) WASHINGTON'S ALREADY FRAGILE MEDICAL STATE HAVE BEEN EXACERBATED BY THE LACK OF INTERVENTION BY PRISON ADMINISTRATION FOR ABUSES BY THEIR STAFF
- (60) PRISON ADMINISTRATION WERE AWARE OF OR REASONABLY SHOULD HAVE BEEN AWARE OF, THE ON GOING PHYSICAL, MENTAL, AND SEXUAL ABUSE WASHINGTON WAS SUBJECTTED TO, BUT ACTED WITH DELIBERATE INDIFFERENCE IN THEIR REFUSAL TO INTERVENE OR PREVENT IT.

- (61) RATHER, AT TIMES, DEFENDANTS, GILMORE, SHAWLEY, DURCO, BARKERFELT, MORRIS, AND WILLIAMS, AND VIHLIDAL ACTED AS PARTY TO THE ABUSE AND CONDUCTED IT, BOTH THROUGH IN ACTION AND ENCOURAGEMENT
- (62) EACH-N-ALL DEFENDANTS, SEPARATELY, AND AT TIME IN PAIRS OFTEN STATED THAT THEIR ACTIONS WERE BEING CONDUCTED PER THE ORDERS OF THEIR SUPERVISORS TO PENALIZE WASHINGTON FOR SUING THEM PERSONALLY, SCI-BGREENE RHU STAFF-N-MEDICAL PROFESSIONALS, AND COMMUNICATIONS WITH AUTHORITIES
- (63) EACH-N-ALL DEFENDANTS, SEPARATELY, AT TIMES IN PAIRS REGULARLY STATED THEY HAD PLANNED, AND AGREED TO CARRY OUT ACTS TO PENALIZE WASHINGTON FOR HAVING SUED THEM PERSONALLY, MEMBERS OF SCI-BGREENE RHU STAFF, AND MEDICAL PROFESSIONALS, AND COMMUNICATIONS WITH AUTHORITIES; AND TO DEPRIVE, PREVENT AND DENY WASHINGTON HIS RIGHTS PROTECTED BY THE CONSTITUTION OF THE U.S.

## VII. RETALIATION VIA DENIAL OF EQUAL PROTECTION

- (64) PARAGRAPH 1 THROUGH 63 ARE INCORPORATED BY REFERENCE
- (65) MEDICAL PROFESSIONALS CONSISTENTLY PROVIDED ALL OTHER RHU INMATES ON SICK CALL, ESPECIALLY WHITE INMATES ON SICK CALL, SUCCESSFULLY, AND PER CONSTITUTION; WHILE CONDUCTING THE SAME EVENT, BASED ON NON-MEDICAL REASONS, PRISON OFFICIALS-N-MEDICAL PROFESSIONALS DENIED WASHINGTON THE SAME CONSTITUTIONAL RIGHTS
- (66) PRISON OFFICIALS-N-MEDICAL PROFESSIONALS CONSISTENTLY SINGLED WASHINGTON OUT TO SUBJECT THEIR ABUSE UPON. THESE ARE ABUSES DEFENDANTS READILY WOULD OF OR REASONABLY SHOULD HAVE FORESEEN, WOULD VIOLATE WASHINGTON CONSTITUTIONALLY PROTECTED RIGHTS. WHITE INMATES WERE NOT SUBJECT TO THESE ABUSES. THESE ABUSES TO WASHINGTON WERE CONNECTED TO WASHINGTON'S ONGOING LITIGATION; ACCORDING TO EACH DEFENDANT, STATED, SUING "ME-N-SCI-BGREENE RHU STAFF," "SUING ME-N-MEMBERS OF SCI-BGREENE MEDICAL STAFF," "PENALIZE PLAINTIFF FOR SUING THEM." THE PRISON OFFICIALS AND MEDICAL PROFESSIONALS OFTEN STATED THAT THEIR ACTIONS WERE UNDER DIRECT ORDERS OF THEIR SUPERVISORS.
- (67) PRISON OFFICIALS AND MEDICAL PROFESSIONALS CONSISTENTLY PROVIDED THE OTHER INMATES IN SOLITARY CONFINEMENT THEIR CONSTITUTIONAL RIGHTS,

WHILE CONDUCTING THE SAME EVENT, PRISON OFFICIALS-N-MEDICAL PROFESSIONALS DENIED WASHINGTON THE SAME CONSTITUTIONAL RIGHTS.

## VIII . STATEMENT OF FACTS

THE FOLLOWING DEFENDANTS, ROBERT D. GILMORE, MS. TRACY SHAWLEY, S. P. ONUROO, P.E. BARKEFELT, A. J. MORRIS, C. WILLIAMS, G. CRABLE, J.M. SMITH, R. NELSON, T.S. OSWALD, L. COMER, T.I. BENNETT, ROBERT HENDRICKS, J. CONDY, J. HEGETER, D. FARRIER, M. STUMP, G. TAIT, J.D. SUHAN, P. DENNISON, I. VIHLIDAL, B. JIN, M. PARK, P. DASCANI, M. COMER, E. MATTES, E. MWaura, VIOLATED MY FIRST AMENDMENT, i.e., CONGRESS SHALL MAKE NO LAW RESPECTING AN ESTABLISHMENT OF RELIGION, OR PROHIBITING THE FREE EXERCISE THEREOF; OR ABRIDGING THE FREEDOM OF SPEECH, OR OF THE PRESS; OR THE RIGHT OF THE PEOPLE PEACEABLY TO ASSEMBLE, AND TO PETITION THE GOVERNMENT FOR A REDRESS OF GRIEVANCES.

ALL OF THE DEFENDANTS, BASED UPON THEIR OWN WORDS RETALIATED AGAINST PLAINTIFF FOR HIS HAVING PETITIONED THE GOVERNMENT FOR A REDRESS OF GRIEVANCES, i.e., SUING THEM, PURSUIT OF JUSTICE FOR DEFENDANTS VIOLATING PLAINTIFF CIVIL RIGHTS; FREEDOM OF SPEECH, FREE EXERCISE OF RELIGION, etc.

AS FOLLOWS

1. ON OR NEAR 7-13-13, DEFENDANTS, T.I. BENNETT, G-BLOCK PROPERTY OFFICER, AND R. HENDRICKS, G BLOCK OFFICER, AFTER 3 P.M., GO 3-CELL; BOTH MEN REGULARLY FACILITATES PLAINTIFF WEEKLY ACCESS TO HIS RELIGIOUS LITERATURE WHEREBY PLAINTIFF RELIGIOUS BELIEFS.
2. BOTH DEFENDANTS ANNOUNCED THEY WERE NOT PROVIDING PLAINTIFF HIS WEEKLY ACCESS TO HIS RELIGIOUS PRACTICE, BOTH DEFENDANTS WALKED AWAY DENYING PLAINTIFF THE LEAST RESTRICTIVE MEANS TO PRACTICE HIS RELIGIOUS BELIEFS, THIS VIOLATED PLAINTIFF FIRST AMENDMENT RIGHT OF RELIGIOUS FREEDOM WITHOUT THE RELIGIOUS LITERATURE PLAINTIFF CANNOT PRACTICE HIS RELIGIOUS BELIEFS. DEFENDANTS, DECLARED (BENNETT-N-HENDRICKS) THIS WAS DONE TO PUNISH PLAINTIFF FOR SUING, DEFENDANT, HENDRICKS; AND COMMUNICATING WITH AUTHORITIES.
3. N.B. THE RELIGIOUS LITERATURE-N-READING OF THE RELIGIOUS LITERATURE AMENDED COMPLAINT: 2:15-CV-1031

URE IS THE PRACTICE OF PLAINTIFF RELIGIOUS BELIEFS. DEFENDANTS DENIAL OF RELIGIOUS LITERATURE MAKES IT UTTERLY IMPOSSIBLE FOR PLAINTIFF TO PRACTICE HIS RELIGIOUS BELIEFS,

4. ON OR NEAR 7-20-13, DEFENDANT, T.I. BENNETT, G-BLOCK PROPERTY OFFICER, OCCURRED IN THE P.M., WEEKLY PROPERTY RELIGIOUS LITERATURE ASSESSMENT.
5. DEFENDANT, BENNETT PROVIDED THE OTHER INMATE ACCESS TO THEIR RELIGIOUS LITERATURE, DENIED PLAINTIFF PER LEAST RESTRICTIVE MEANS, PREVENTED PLAINTIFF PRACTICE OF HIS RELIGIOUS BELIEFS, VIOLATED PLAINTIFF FREE EXERCISE OF RELIGION UNDER FIRST AND FOURTEENTH AMENDMENTS
6. ON OR NEAR 8-3-13, DURING THE P.M., DEFENDANT, T.I. BENNETT, PROPERTY OFFICER PROVIDED THE OTHER INMATES ACCESS TO THEIR RELIGIOUS LITERATURE DENIED PLAINTIFF ACCESS PER THE LEAST RESTRICTIVE MEANS WHICH DENIED PLAINTIFF PRACTICE OF HIS RELIGIOUS BELIEFS VIOLATED PLAINTIFF FREE EXERCISE OF RELIGION UNDER FIRST AND FOURTEENTH AMENDMENTS; OCCURRED GD POD
7. ON OR NEAR 8-10-13, ON GD POD, DURING THE P.M., DEFENDANT, T.I. BENNETT, PROPERTY OFFICER PROVIDED THE OTHER INMATES ACCESS TO THEIR RELIGIOUS LITERATURE, DENIED PLAINTIFF ACCESS, PER THE MOST RESTRICTIVE MEANS WHICH DENIED PLAINTIFF THE PRACTICE OF HIS RELIGIOUS BELIEFS VIOLATED PLAINTIFF FREE EXERCISE OF RELIGION UNDER FIRST AND FOURTEENTH AMENDMENTS
8. ON OR NEAR 5-2-14, DURING THE P.M., DEFENDANT, T.I. BENNETT, PROPERTY OFFICER, PROVIDED THE INMATES ON GD POD ACCESS TO THEIR RELIGIOUS LITERATURE, PER MOST RESTRICTIVE MEANS DENIED PLAINTIFF ACCESS, WHICH DENIED PLAINTIFF THE PRACTICE OF HIS RELIGIOUS BELIEFS VIOLATED PLAINTIFF FREE EXERCISE OF RELIGION UNDER FIRST AND FOURTEENTH AMEND.
9. ON OR NEAR 5-10-14, DURING THE P.M., DEFENDANT, L. COMER, GA POD OFFICER, PROVIDED THE GA POD INMATES ACCESS TO THEIR RELIGIOUS LITERATURE, PER MOST RESTRICTIVE MEANS, DENIED PLAINTIFF ACCESS, WHICH DENIED PLAINTIFF PRACTICE OF HIS RELIGIOUS BELIEFS, VIOLATED PLAINTIFF RELIGIOUS FREEDOM UNDER FIRST AND FOURTEENTH AMENDMENTS
10. ON OR NEAR 5-17-14, DURING THE P.M., DEFENDANT, L. COMER, GA POD OFFICER PROVIDED THE GA POD INMATES ACCESS TO THEIR RELIGIOUS LITERATURE, DENIED PLAINTIFF ACCESS. PER MOST RESTRICTIVE MEANS, WHICH DENIED PLAINTIFF PRACTICE OF HIS RELIGIOUS BELIEFS.

VIOLATED PLAINTIFF FREE RELIGIOUS EXERCISE UNDER FIRST AND FOURTEENTH AMENDS.

11. ON OR NEAR 7-5-14, DURING THE P.M., DEFENDANT, J. CODDY, GA POD OFFICER PROVIDED INMATES THEIR ACCESS TO THEIR RELIGIOUS LITERATURE DENIED PLAINTIFF ACCESS PER MOST RESTRICTIVE MEANS, WHICH DENIED PLAINTIFF PRACTICE OF HIS RELIGIOUS BELIEFS VIOLATED PLAINTIFF FREE EXERCISE OF RELIGION UNDER FIRST AND FOURTEENTH AMENDS.
12. ON OR NEAR 4-19-15, DURING THE P.M., DEFENDANT, G. TAIT, GA POD OFFICER PROVIDED INMATES ACCESS TO THEIR RELIGIOUS LITERATURE, DENIED PLAINTIFF ACCESS PER MOST RESTRICTIVE MEANS, WHICH DENIED PLAINTIFF PRACTICE OF HIS RELIGIOUS BELIEF VIOLATED PLAINTIFF FREE EXERCISE OF RELIGION UNDER FIRST AND FOURTEENTH AMENDMENT.
13. ON OR NEAR, 5-24-15, ON GA POD DURING THE P.M., DEFENDANTS, G. CRABBLE, G BLOCK SERGEANT AND J. HEGETER, GA POD OFFICER PROVIDED INMATES ACCESS TO THEIR RELIGIOUS LITERATURE, PER MOST RESTRICTIVE MEANS DENIED PLAINTIFF, WHICH DENIED PLAINTIFF PRACTICE OF HIS RELIGIOUS BELIEFS VIOLATED PLAINTIFF FREE EXERCISE OF RELIGION UNDER FIRST AND FOURTEEN AMENDMENTS.
14. N.B. DEFENDANTS, T.I. BENNETT, R. HENDRICKS, L. COMER, J. CODDY, G. TAIT, G. CRABLE, J. HEGETER, AND C. WILLIAMS TREATED PLAINTIFF DIFFERENT FROM OTHER INMATES ON GD, AND GA POD WHILE CONDUCTING PROVISION OF ACCESS TO RELIGIOUS LITERATURE, SEE PP 10-12, ABOVE AT 1-16 VIOLATED PLAINTIFF "EQUAL PROTECTION OF THE LAWS" UNDER 14 AMENDMENT SECTION 1,
- (15) ALL PERSONS BORN OR NATURALIZED IN THE UNITED STATES, AND SUBJECT TO THE JURISDICTION THEREOF, ARE CITIZENS OF THE UNITED STATES AND OF THE STATE WHEREIN THEY RESIDE. NO STATE SHALL MAKE OR ENFORCE ANY LAW WHICH SHALL ABROGATE THE PRIVILEGES OR IMMUNITIES OF CITIZENS OF THE UNITED STATES; NOR SHALL ANY STATE DEPRIVE ANY PERSON OF LIFE, LIBERTY, OR PROPERTY, WITHOUT DUE PROCESS OF LAW; NOR DENY TO ANY PERSON WITHIN ITS JURISDICTION <sup>THE</sup> EQUAL PROTECTION OF THE LAWS. 14th AMENDMENTS TO THE U.S. CONSTITUTION

16. ON OR NEAR ~~4~~ 4.19.15, IN G BLOCK CONFERENCE ROOM, DURING THE P.M., DEFENDANT, C. WILLIAMS, G-BLOCK LIEUTENANT APPROVED THE PROVISIONS FOR GA POD INMATES TO HAVE ACCESS TO THEIR RELIGIOUS LITERATURE, BASED ON NON PENALOGICAL REASONS DENIED PER MOST RESTRICTIVE MEANS DENIED PLAINTIFF ACCESS, WHICH AMENDED COMPLAINT: 2:15-cv-1031 (1a)

DENIED PLAINTIFF PRACTICE OF HIS RELIGIOUS BELIEFS VIOLATED PLAINTIFF FREE EXERCISE OF RELIGION UNDER THE FIRST AND FOURTEENTH AMENDMENT

17. DEFENDANT, P.E. BARKEFELT, RHU LIEUTENANT, DURING THE AM. PROVIDED ALL INDIGENT INMATES THEIR MONTHLY INDIGENT PACKET. DENIED PLAINTIFF, AN INDIGENT PACKET CAUSING PLAINTIFF TO DRAFT PLEADING TO HIS LEGAL (WASHINGTON V. FOLINA, 2:11-cv-1046; 14-1880 IN THE THIRD CIRCUIT) TWO LINES IN SMALL PRINT INSIDE OF ONE SPACE, TO BE DENIED/DISMISS, DENIED PLAINTIFF ACCESS TO COURT-N-FREE SPEECH, AND RIGHT TO PETITION THE GOVERNMENT FOR A REDRESS OF GRIEVANCE UNDER THE FIRST AMENDMENT; "EQUAL PROTECTION OF LAW" AND FOURTEENTH AMENDMENTS;

18. THE SAME VIOLATION, WHICH OCCURRED CONTINUOUSLY BEGINNING FALL OF 2010 UNTIL FALL OF 2014, DEFENDANT, BARKEFELT DENIAL OF INDIGENT PACKET, FORCED PLAINTIFF TO DRAFT HIS PLEADINGS TO WASHINGTON V. FOLINA USING TWO LINES PER SPACE IN SMALL PRINT, WHICH HINDERED, STYMIED-N-DENIED ██████████ AND PREVENTED PLAINTIFF FROM SUBMITTING A COMPLAINT IN COMPLIANCE TO FRCP 8, VIOLATED PLAINTIFF FREEDOM OF SPEECH, AND RIGHT TO PETITION THE GOVERNMENT FOR A REDRESS OF GRIEVANCE UNDER FIRST AMENDMENT

19. BEGINNING JANUARY 2013 UNTIL JULY 2015, DEFENDANT, A.J. MORRIS RHU LIEUTENANT, A. M. OCCURANCE, PROVIDED RHU INMATES THEIR INDIGENT PACKET TWICE EACH MONTH, DENIED PLAINTIFF INDIGENT PACKET TWICE EACH MONTH, WHICH FORCED PLAINTIFF TO DRAFT PLEADINGS IN SMALL PRINT TWO LINES INSIDE OF ONE SPACE, THAT HINDER, PREVENTED-N-STYMIED PLAINTIFF ABILITY TO COMPLY TO FRCP 8, VIOLATED PLAINTIFF "FREEDOM OF SPEECH," "RIGHT TO PETITION THE GOVERNMENT FOR REDRESS OF GRIEVANCE," UNDER THE FIRST AMENDMENT. DURING THE P.M.

20. DURING JANUARY 2013 UNTIL JULY 2015, IN THE RHU, DEFENDANT, A.J. MORRIS PROCURED THE PROCESS OF OUT-GOING OF GRIEVANCE OF RHU INMATES, DENIED ACCESS TO OUTGOING GRIEVANCES, e.g., WITH PLAINTIFF TIMELY SUBMITTED REQUEST TO STAFF, SEVERAL GRIEVANCES-N-APPEALS IN HAND DEFENDANT, MORRIS CAME TO PLAINTIFF CELL, FD POD, 1B BLOCK, G-BLOCK, THEN TORE THOSE DOCUMENTS INTO SMALL PIECES, AND PLACED THEM IN THE TRASH BARREL, WHICH DENIED PLAINTIFF ACCESS TO OUT GOING MAIL-N-GRIEVANCE SYSTEM. VIOLATED PLAINTIFF FREEDOM OF SPEECH. AND RIGHT TO PETITION THE GOVERNMENT COMPLAINT: 2:15-cv-1031 (13)

21. ERIMENT FOR A REDRESS OF GRIEVANCES UNDER THE FIRST AMENDMENT, IN THE P.M.  
 22. ON OR NEAR JANUARY 2010 UNTIL JULY 2015; DURING THE A.M., IN THE RHU, DE-  
 FENDANT, T. SHAWLEY, WARDEN'S ASSISTANT, ASSIGNED GRIEVANT TRACKING NUMBER  
 THE OTHER RHU INMATES, BASED ON NON PENALOGICAL REASONS DENIED PLAINTIFF  
 TIMELY SUBMITTED GRIEVANCE A TRACKNG NUMBER OR WOULD NOT RESPOND, DENIED PL-  
 AINT ACCESS TO THE GRIEVANCE SYSTEM, WHICH DENIED PLAINTIFF "FREEDOM OF SPEECH"  
 AND "EQUAL PROTECTION", UNDER THE FIRST AND FOURTEENTH AMENDMENTS.

23. SAME EVENT, DEFENDANT, SHAWLEY MORE THAN ONCE, WHEN PLAINTIFF ASK-  
 ED WHEN DEFENDANT, SHAWLEY COLLECTED GRIEVANCES IN THE RHU; CONCERNING  
 HIS NOT RECEIVING HIS GRIEVANCES BACK, APPEALS, AND INDIGENT PACKETS, DEFEN-  
 DANT, SHAWLEY, DECLARED SHE WAS FULLY AWARE, SHE WAS NOT RETURNING PLAINT-  
 IFF TIMELY SUBMITTED GRIEVANCE-N-APPEALS TO PENALIZE PLAINTIFF FOR SUING  
 HER, AND FOR COMMUNICATING WITH AUTHORITIES; DENIED PLAINTIFF ACCESS TO  
 THE GRIEVANCE SYSTEM; THE OTHER RHU INMATES WAS TREATED DIFFERENT; VIOL-  
 ATED PLAINTIFF ACCESS TO THE GRIEVANCE SYSTEM, "FREEDOM OF SPEECH" AND "EQUAL  
 PROTECTION" UNDER THE FIRST-AND FOURTEENTH AMENDMENTS

24. 2014 UNTIL 2014, DEFENDANT, S.P. DURCO, RHU COMMANDER, DURING THE A.M., IN  
 THE RHU, CAME TO PLAINTIFF CELL, GC-9; UNANNOUNCED, HAVING SEVERAL  
 OF PLAINTIFF OUTGOING TIMELY SUBMITTED GRIEVANCES IN HAND, DECLARED  
 TO PLAINTIFF HE WAS PENALIZING PLAINTIFF FOR SUING HIM, SCI-GREENE  
 DOC STAFF-N-MEDICAL PERSONNEL, AND FOR COMMUNICATIONS WITH AUTHORITIES  
 HE WAS DESTROYING PLAINTIFF TIMELY SUBMITTED GRIEVANCE; THE OTHER RHU  
 INMATES OUT GOING GRIEVANCES WERE LEFT UNTouched, PLAINTIFF TIMELY SUB-  
 MITTED WAS NEVER RETURNED TO PLAINTIFF, DENIED PLAINTIFF ACCESS TO THE GR-  
 IEVANCE SYSTEM, WHICH VIOLATED PLAINTIFF "FREEDOM OF SPEECH" AND "EQ-  
 UAL PROTECTION" UNDER THE FIRST AND 14<sup>th</sup> AMENDMENTS

25. DEFENDANTS, GILMORE, R; T. SHAWLEY, S.P. DURCO, P.E. BARKEFELT, A.J. MORRIS, C.  
 WILLIAMS, B. CRABLE, J.M. SMITH, R. NELSON, T.S. OSWALD, L. COMER, T.I. BENN-  
 ETT, R. HENDRICKS, J. COODY, J. HESETER, D. FARRIER, M. STUMP, G. TAIT, J.D. SUHAN,  
 I. VIHLIDAL, B. JIN, M. PARK, P. DASCANE, M. COMER, E. MATTES, E. MWaura,  
 AMENDED COMPLAINT:2:15-cv-1031

P. DENNISON VIOLATED PLAINTIFF EQUAL PROTECTION UNDER FOURTEENTH AMENDS.  
 25. PLAINTIFF ALLEGE AND INCORPORATE PARAGAHS 1-2~~4~~ OF SECT. VIII BY REFERENCE

26. AMENDMENT VIII: EXCESSIVE BAIL SHALL NOT BE REQUIRED, NOR EXCESSIVE FINES IMPOSED; NOR CRUEL AND UNUSUAL PUNISHMENT INFILTED.

27. DEFENDANTS: I. VIHLIDAL, B. JIN, M. PARK, P. DASCANI, MARY COMER, E.

① MATTES, E. MWaura, P. DENNISON, J. M. SMITH, R. NELSON, T. S. OSWALD, D. FARRIER, M. STUMP, J. D. SUHAN VIOLATED PLAINTIFF EIGHTH AMENDMENT

28. PLAINTIFF REQUEST THAT THE COURT APPLY THE FOLLOWING TO DEFENDANTS: R. D. BILMORE, T. SHAWLEY, S. P. DURCO, P. E. BARKEFELT,

A. J. MORRIS, C. WILLIAMS, G. CRABLE, J. M. SMITH, R. NELSON, T. S. OSWALD, L.

COMER, T. I. BENNETT, R. HENDRICKS, J. CODDY, J. HEGETER, D. FARRIER, J. D.

SUHAN, M. STUMP, G. TAIT, P. DENNISON, I. VIHLIDAL, B. JIN, M. PARK, P.

DASCANI, M. COMER, E. MATTES, E. MWaura; DECLARED THEIR ACTIONS WERE

BEING DONE TO PLAINTIFF TO PENALIZE PLAINTIFF FOR SUING THEM / AND OR FOR SUING SCI-GREENE DOC STAFF, AND MEDICAL PROFESSIONALS; AND FOR CONTINUOUS COMMUNICATIONS WITH AUTHORITIES.

② DEFENDANTS: B. JIN, M. PARK, P. DASCANI, M. COMER, E. MATTES, AND E. MWaura IN EACH OF FOLLOWING RELATIVE INSTANCES IN THEIR DENIAL OF MEDICAL CARE NEVER TAUCHED PLAINTIFF PHYSICALLY; NOT EVEN CURSORY EXAM OF BLOOD PRESSURE, TEMPERATE, HEART RATE, BREATHING PATTERN-N-PUPIL DILATION, NO LAB TEST OF BLOOD, URINE OR STOOL SAMPLE; OR PAPSMEAR

③ DEFENDANTS, B. JIN, E. MWaura, E. MATTES, P. DASCANI RESPONDED TO PLAINTIFF PLEAS FOR ~~████████~~ IMMEDIATE MEDICAL CARE BY RAISING THEIR MIDDLE FINGER THEN WALKED AWAY

④ WHEN PLAINTIFF REFERTS CHRONIC AILMENT THIS SHOULD BE INTERPRETED TO INCLUDE: NON STOP EXCRUCIATING PAINFUL INTESTINAL CRIPPE, DIFFICULTY SPEAKING, BREATHING-N-CONCENTRATING, NEAR BLIND IN RIGHT EYE, DEMENTIA, SWOLLEN ANKLES, DIARRHEA, CAUSED BY FOOD SERVED TO INMATES, DRIPPING SEMEN, MEMORY LOSS, CONTINUOUS NOSE BLEEDS-N-FATIGUE; TESTOSTERONE AMENDED COMPLAINT: 2:15-cv-1031

DEFICIENCY, URETHRAL STRICTURE, IRREVERSIBLE FOOT FUNGUS, DEFORMED FINGERS AND ELBOWS, INTENSE CHEST PAIN

38. ON OR NEAR 7.<sup>8</sup>, 13, A.M. DURING SICK CALL AT GD 3-CELL, DEFENDANT, B. JIN, DOCTOR, PLAINTIFF EXPERIENCED NON STOP EXCRUCIATING PAIN CAUSED BY CHRONIC MEDICAL NEEDS. DEFENDANT, JIN RESPONDED WITH DELIBERATE INDIFFERENCE, DECLARED FOR NON MEDICAL REASONS HE DENIED PLAINTIFF CARE (SEE 27(1)(2)(4)), VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL AND UNUSUAL PUNISHMENT, "EQUAL PROTECTION" UNDER THE EIGHT-N-FOURTEENTH AMENDMENTS; DEFENDANT, JIN WALKED AWAY WHILE PLAINTIFF WAS CLUTCHING HIS CHEST WITH BOTH HAND-N-GASPING FOR AIR. DEFENDANT, JIN PROVIDED THEM OTHER INMATES MEDICAL CARE.
39. ON OR NEAR 7.<sup>8</sup>, 13, DR. B. JIN, A.M. SICK CALL ON B.D. POD, SUCCESSFULLY PROVIDED MEDICAL CARE OTHER INMATES; PLAINTIFF EXPLAINED (ABOVE 27(4)) IN DETAIL, DEFENDANT, JIN RESPONDED WITH DELIBERATE INDIFFERENCE, BEGIN TO MIMICK KISING PLAINTIFF, WHILE HE RUBBED HIS PENIS, THIS HAS LEFT PLAINTIFF PSYCHOLOGICALLY DAMAGED; VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO EQUAL PROTECTION UNDER EIGHTH AND FOURTEENTH AMENDMENTS; DENIAL OF MEDICAL CARE (SAME EVENT)
30. ON OR NEAR 7.26.13, DR. JIN A.M. SICK CALL ON GD POD. THE INMATES WERE PROVIDED MEDICAL CARE, BASED ON NON MEDICAL REASONS PLAINTIFF WAS DENIED, LEAVING PLAINTIFF IN NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT (SEE ABOVE: 27(1)(2)(4)), WHICH DENIED PLAINTIFF MEDICAL CARE, VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL AND UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION" UNDER EIGHTH AND FOURTEENTH AMENDMENTS
31. ON OR NEAR 7.26.13, SAME EVENT, DEFENDANT, JIN RESPONDED TO PLAINTIFF MEDICAL NEEDS WITH DELIBERATE INDIFFERENCE (SEE ABOVE 27(4)), DECLARED TO PLAINTIFF, HE WAS GOING TO GIVE PLAINTIFF A GOOD FUCKING, DENIED PLAINTIFF MEDICAL CARE, CAUSED PSYCHOLOGICAL DAMAGE, VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL AND UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION" UNDER EIGHTH AND FOURTEENTH AMENDS.
32. ON OR NEAR 8.33.13, DR. B. JIN, A.M. SICK CALL ON GD POD, PROVIDED OTHER INMATES MEDICAL CARE, PLAINTIFF IN NON-STOP EXCRUCIATING-N-EXTREME DISCOMFORT, DEFENDANT, JIN DECLARED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, ACTED WITH DELIBERATE INDIFFERENCE, BASED ON NON MEDICAL REASONS (SEE ABOVE 27(1)(2)(4)) DENIED PLAINTIFF MEDICAL CARE, VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL AND UNUSUAL PUNISHMENT, AND TO EQUAL PROTECTION UNDER EIGHTH AND FOURTEENTH AMENDMENTS.

IFF MEDICAL CARE, VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL AND UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION" UNDER EIGHTH AND FOURTEENTH AMENDMENTS, 33. SAME EVENT, DEFENDANT, B. JIN, ACKNOWLEDGED HE WAS FULLY AWARE PLAINTIFF EXPERIENCED SHARP CHEST PAIN-N-DIFFICULTY BREATHING, THEN RESPONDED WITH DELIBERATE INDIFFERENCE, DECLARED, PLAINTIFF NEEDED FOR HIM TO GIVE PLAINTIFF A GOOD FUCKING, DEFENDANT, JIN SPOKE THOSE WORDS WHILE HOLDING HIS PENIS IN HAND; DENIED PLAINTIFF MEDICAL CARE-N-Psychological DAMAGE, WHICH VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND "EQUAL PROTECTION", UNDER EIGHTH AND FOURTEENTH AMENDMENTS.

34. ON OR NEAR 8.29.13, DR. M. PARK, A.M. SICK CALL ON POD PROVIDED OTHER INMATES MEDICAL CARE; PLAINTIFF EXPERIENCING NON STOP EXCRUCIATING PAIN AND DISCOMFORT (SEE 27 (1) (3) (4) ABOVE) DEFENDANT, PARK PROFESSED PLAINTIFF NEEDED IMMEDIATE MEDICAL CARE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE, BASED ON NON MEDICAL REASON HE DENIED PLAINTIFF MEDICAL CARE, VIOLATED RIGHT TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT

35. SAME EVENT, DEFENDANT, M. PARK WALKED AWAY LEAVING <sup>PLAINTIFF</sup> ON THE FLOOR GASPING FOR AIR, WHICH DENIED PLAINTIFF MEDICAL CARE. VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION", UNDER 8th, AND 14th AMEND.

36. ON OR NEAR 9.5.13, DR. B. JIN, A. M. SICK CALL ON GD POD, PROVIDED OTHER INMATES MEDICAL CARE; BASED ON NON MEDICAL REASNS DENIED PLAINTIFF MEDICAL CARE, EXPERIENCING INTENSE CHEST PAIN, STRUGGLING TO BREATHE TO SUCH EXTENT PLAINTIFF HAD TO LEAN ON THE WALL TO REMAIN UPRIGHT CAUSING NON STOP PAIN-N-EXTREME DISCOMFORT CAUSED BY (SEE ABOVE 27 (1) (3) (4)) CHRONIC AILMENT

37. SAME EVENT, DEFENDANT, JIN ACKNOWLEDGED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE, WALKED AWAY CLAPPING HIS HANDS AS HE SANG, DENIED PLAINTIFF MEDICAL CARE, VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL-N-UNUSAL PUNISHMENT, AND TO "EQUAL PROTECTION" UNDER EIGHTH AND 14th AMENDMENTS

38. ON OR NEAR 9.26.13, DEFENDANT, B. JIN, DOCTOR, A. M. SICK CALL ON BD POD PROVIDED MEDICAL CARE TO OTHER INMATES, DENIED PLAINTIFF BASED ON NON MEDICAL REASNS, EXPERIENCING SHARP CHEST PAIN TO SUCH EXTENT PLAINTIFF HAD TO CRAWL TO THE DOOR; NON STOP EX-AMENDED COMPLAINT:2:15-CV-1031 (17)

CRUCIATING PAIN-N-EXTREME DISCOMFORT (SEE ABOVE 27(1)(2)(4)), ACKNOWLEDGED PLAINTIFF NEEDED IMMEDIATE MEDICAL CARE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE, WALKED PLAINTIFF AWAY LEAVING ON HIS KNEES GASPING FOR AIR, THE DENIAL OF MEDICAL CARE VIOLATED PLAINTIFF'S RIGHT TO BE FREE FROM CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION," PER 8TH AND 14TH AMENDS.

39. SAME EVENT, PLAINTIFF IN NEED OF IMMEDIATE MEDICAL CARE, DEFENDANT, B JIN RESPONDED, "OH, SUGAR YOU SICK, I GIVE YOU SOME DICK, AND YOU'LL FEEL BETTER," WALKED AWAY LEAVING PLAINTIFF ON HIS KNEES GASPING FOR AIR, DENYING PLAINTIFF MEDICAL CARE VIOLATED PLAINTIFF'S RIGHT TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND EQUAL PROTECTION UNDER THE EIGHTH AND 14TH AMENDMENTS

40. ON OR NEAR 12.17.13, DR. B. JIN, A.M. SICK CALL ON GD POD PROVIDED THE OTHER INMATES MEDICAL CARE; PLAINTIFF EXPERIENCING SHARP CHEST PAIN, AND NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT CAUSED BY CHRONIC AILMENTS (SEE ABOVE, 27(1)(2)(4)) WAS DENIED BASED ON NON MEDICAL REASONS, DEFENDANT, JIN DECLARED PLAINTIFF NEEDED IMMEDIATE MEDICAL CARE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE.

41. SAME EVENT, DEFENDANT, JIN WALKED AWAY LEAVING PLAINTIFF LYING NUDE ON THE FLOOR CLUTCHING HIS CHEST, MOUTH AGAPED FOR AIR, DENIED PLAINTIFF MEDICAL CARE VIOLATED PLAINTIFF'S RIGHT TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND "EQUAL PROTECTION" UNDER THE 8TH AND 14TH AMENDMENTS.

42. SAME EVENT, DEFENDANT, JIN RESPONDED TO PLAINTIFF NEED OF IMMEDIATE EMERGENCY MEDICAL CARE WAS TO ~~INSTRUCT~~ PLAINTIFF TO REMOVE ALL OF HIS CLOTHING, TURN HIS BACK TO DEFENDANT, JIN, TO BEND AT THE WAIST WHILE USING BOTH HANDS TO SPREAD THE CHEEKS OF HIS BUTTOCK, DEFENDANT, JIN BEGAN TO MAKE SOUNDS AS IF HE WAS EXPERIENCING AN ORGASM, "OH MAMA". PLAINTIFF SANKED TO THE FLOOR, DEFENDANT, JIN WALKED AWAY

43. ON OR NEAR 12.19.13, DR. B. JIN, A.M. SICK CALL ON GD POD, PROVIDED MEDICAL CARE TO THE OTHER INMATES, DENIED PLAINTIFF BASED ON NON MEDICAL REASONS WHO EXPERIENCED NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT (SEE ABOVE 27(1)(2)(4)), DENIAL OF MEDICAL CARE LEAVING PLAINTIFF IN PAIN

44. SAME EVENT, DEFENDANT, JIN, DECLARED PLAINTIFF CONDITION WARRANTED IMMEDIATE EMERGENCY MEDICAL CARE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE.

INSTRUCTED PLAINTIFF TO REMOVE ALL OF HIS CLOTHING, PULL THE FORRESKIN OF HIS PENIS BACK; WHISPERING, DEFENDANT, JIN SAID TO PLAINTIFF 'OH HONEY, OH HONEY' AND MIMICKED KISSING PLAINTIFF AND RUBBING HIS OWN PENIS

45. SAME EVENT, DEFENDANT, JIN WALKED AWAY HOLDING HIS PENIS IN HAND, LEAVING PLAINTIFF IN THE NUDE SLUMMED AGAINST THE DOOR IN NON STOP EXCRUCIATING PAIN AND EXTREME DISCOMFORT STRUGGLING TO BREATHE; DENIED MEDICAL CARE VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT UNDER 8TH, -N-14TH AMEND

46. ON OR NEAR 12, 27, 13, DR. B. JIN, A.M. SICK CALL ON GD POD DENIED PLAINTIFF MEDICAL CARE FOR CHRONIC AILMENTS, AND EXPERIENCING INTENSE CHEST PAIN (SEE ABOVE 27 (1) (3) (4)) BASED ON NON MEDICAL REASONS, BUT PROVIDED MEDICAL CARE TO THE OTHER INMATES, LEAVING PLAINTIFF EXPERIENCING NON-STOP PAIN-N-EXTREME DISCOMFORT,

47. SAME EVENT, DEFENDANT, JIN PRONOUNCED THAT PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE REFERRED TO PLAINTIFF AS "BABY"; INSTRUCTED PLAINTIFF TO REMOVE ALL OF HIS CLOTHINGS, THEN ASKED PLAINTIFF, "BABY, ARE YOU READY FOR DADDY TO GIVE YOU A GOOD FUCK-ING, YOU'LL FEEL BETTER", DENIED MEDICAL CARE VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO EQUAL PROTECTION" UNDER 8TH-N-14TH AMENDMENTS

48. ON OR NEAR 1.9. 14, DR. M. PARK, A.M. SICK CALL ON GD POD PROVIDED MEDICAL CARE TO THE OTHER INMATES; DENIED PLAINTIFF BASED ON NON MEDICAL REASONS, EXPERIENCING SHARP CHEST PAIN, DIFFICULTY BREATHING, AND CHRONIC AILMENTS (SEE ABOVE 27 (1) (2) (4)) LEAVING EXPERIENCING NON STOP EXCRUCIATING PAIN AND EXTREME DISCOMFORT.

49. SAME EVENT, DEFENDANT, PARK DECLARED PLAINTIFF NEED IMMEDIATE EMERGENCY MEDICAL CARE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE, HAVING A SCALPEL IN HAND INSTRUCTED TO COME TO THE DOOR; SAID TO PLAINTIFF, FIRST CHANGE HE GET HE WAS GOING TO SLIT PLAINTIFF THROAT; WHICH DENIED PLAINTIFF MEDICAL CARE; VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO EQUAL PROTECTION" UNDER EIGHTH AND FOURTEENTH AMENDMENTS

50. ON OR NEAR 1.24.14, DR. B. JIN, A.M. SICK CALL ON GD POD, PROVIDED THE OTHER INMATES MEDICAL CARE, EXPERIENCING EXTREME CHEST PAIN, THE LOSS OF EYESIGHT IN RIGHT AMENDMENT COMPLAINT: 2:15-cv-1031 (19)

EYE, AND CHRONIC AILMENTS (SEE ABOVE, 27 (J) (2)(4)) WAS DENIED BASED ON NON MEDICAL REASONS, LEAVING PLAINTIFF IN NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT. DEFENDANT, STATED THAT PLAINTIFF NEEDED IMMEDIATE EMERGENCY CARE, THEN

51. SAME EVENT, DEFENDANT, JIN RESPONDED WITH DELIBERATE INDIFFERENCE, INSTRUCTED PLAINTIFF TO COME TO THE DOOR, DEFENDANT, JIN'S EYES WERE SHOWING WILD EXCITEMENT; HE ASKED PLAINTIFF TO SHOW HIM HIS ASSHOLE, PLEASE SWEETHEART

52. SAME EVENT, PLAINTIFF SINK TO THE FLOOR IN PAIN, HOLDING HIS CHEST, PANTING, BEGGING DEFENDANT, JIN FOR MEDICAL CARE; DEFENDANT, JIN RESPONSE, BABY, I WANT SOME OF YOUR ASSHOLE, THEN WALKED AWAY LEAVING PLAINTIFF SRAWLED OUT ON THE FLOOR, DENIED PLAINTIFF MEDICAL CARE VIOLATED PLAINTIFF RIGHTS TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION" UNDER EIGHTH AND FOURTEENTH AMDS.

53. ON OR NEAR 3.21.14, MS. M. COMER, PAC, A.M. SICK CALL ON QD POD PROVIDED THE OTHER INMATES MEDICAL CARE, DENIED PLAINTIFF IN LIGHT OF PLAINTIFF SUFFERING WITH SHARP CHEST PAIN-N-DIFFICULTY BREATHING TO SUCH EXTENT PLAINTIFF STRUGGLED TO REMAIN UPRIGHT, AND CHRONIC AILMENTS CAUSING NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT, BASED ON NON MEDICAL REASONS (SEE 27 (J) (2)(4))

54. SAME EVENT, DEFENDANT, COMER, PROCLAIMED THAT PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE DEFENDANT, COMER WALKED AWAY LEAVING PLAINTIFF BEGGING HER FOR MEDICAL CARE, STRUGGLING TO REMAIN UPRIGHT-N-TO BREATHE, IN NON STOP EXCRUCIATING PAIN-N-DISCOMFORT, WHICH DENIED MEDICAL CARE, VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION" UNDER EIGHTH AND FOURTEENTH AMENDMENTS.

55. ON OR NEAR 4.30.14, DR. B. JIN, A.M. SICK CALL ON QD POD PROVIDED THE OTHER INMATES MEDICAL CARE, DENIED PLAINTIFF BASED ON NON MEDICAL REASONS, UNABLE TO RAISE HIS VOICE ABOVE A WHISPER, EXPERIENCING NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT DUE TO CHRONIC AILMENTS (SEE 27 (J) (2)(4) ABOVE)

56. SAME EVENT, DEFENDANT, JIN, DECLARED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE INSTRUCTED PLAINTIFF TO REMOVE HIS CLOTHING, DECLARED, "SHOW ME THE HEAD OF YOUR PENIS", AS DEFENDANT, JIN WET HIS LIPS-N-GAWKING AT THE SIGHT OF PLAINTIFF PENIS WHILE RUBBING HIS CHEST-N-MAKING SOUNDS LIKEN TO A FEMALE EXPERIENCING A ORGASM,

57. SAME EVENT, DEFENDANT, JIN DENIED PLAINTIFF MEDICAL MEDICAL CARE; WALKED AWAY HOLDING HIS PENIS IN HAND LEAVING PLAINTIFF IN THE NUDE, STRUGGLING TO SPEAK AND IN NON STOP EXCRUCIATING PAIN BEGGING FOR MEDICAL CARE. VIOLATED PLAINTIFF RIGHTS TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT; AND TO "EQUAL PROTECTION UNDER EIGHTH AND FOURTEENTH AMENDMENTS

58. ON OR NEAR 5.2.14, DR M. PARK, A.M. SICK CALL ON GA POD PROVIDED THE OTHER INMATES, BASED ON NON MEDICAL REASONS DENIED PLAINTIFF MEDICAL CARE EXPERIENCING NON STOP ~~EXCRUCIATING~~ EXCRUCIATING PAIN-N-EXTREME DISCOMFORT, DEFENDANT, PARK DECLARED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE (SEE 27(1)(2)(4)) ABOVE) ~~ACTED WITH DELIBERATE INDIFFERENCE~~

59. SAME EVENT, DEFENDANT, PARK WALKED AWAY LEAVING PLAINTIFF GASPING FOR AIR, ON BOTH KNEES DUE TO LACK OF STRENGTH IN NON STOP PAIN-N-DISCOMFORT BEGGING FOR MEDICAL CARE, THIS DENIAL OF MEDICAL CARE VIOLATED PLAINTIFF RIGHTS TO BE FREE OF CRUEL-AND UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION" UNDER THE EIGHTH-N-FOURTEENTH AMENDMENTS

60. ON OR NEAR 5.12.14, DR. M. PARK, A. M. SICK CALL ON GA POD PROVIDED THE OTHER INMATES MEDICAL CARE; STRUGGLING TO BREATHE, EXPERIENCING NON STOP EXCRUCIATING PAIN-N-DISCOMFORT CAUSED BY CHRONIC AILMENT PLAINTIFF WAS DENIED BASED ON NON MEDICAL REASONS. DEFENDANT, PARK STATED, PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE (SEE 27(1)(2)(4) ABOVE)

61. SAME EVENT, DEFENDANT, PARK WALKED AWAY LEAVING PLAINTIFF ON THE FLOOR WEAGED BETWEEN THE DOOR-N-DOOR FRAME, IN NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT BEGGING FOR MEDICAL CARE, MOUTH AGAPE, STRUGGLING TO BREATHE, DENIED MEDICAL CARE VIOLATED PLAINTIFF RIGHTS TO BE FREE OF CRUEL AND UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION UNDER 8th-N-14th AMENDS.

62. ON OR NEAR 5/6/14, DR. PARK, AM. SICK CALL ON GA POD, DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS WHERE PLAINTIFF EXPERIENCE NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT, SO WEAK PLAINTIFF USED THE WALL TO REMAIN STANDING, CAUSED BY CHRONIC AILMENTS (SEE 27(1)(2)(4), ABAMENDED COMPLAINT 2:15-CV-1031

OVE), BUT PROVIDED MEDICAL CARE TO THE OTHER INMATES, ACKNOWLEDGED PLAINTIFF NEEDED TO BE SEEN BY EMERGENCY MEDICAL PERSONNEL IMMEDIATELY

63. SAME EVENT: DEFENDANT, PARK RESPONDED WITH DELIBERATE INDIFFERENCE WALKED AWAY LEAVING PLAINTIFF IN NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT, TOO WEAK TO STAND WITHOUT THE AID OF THE WALL, BEGGING FOR MEDICAL CARE, VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION" UNDER THE EIGHTH, AND FOURTEENTH AMENDMENTS

64. ON OR NEAR 5.27.14, DR. M. PARK, A.M. SICK CALL ON GA POD DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS, PROVIDED THE OTHER INMATES MEDICAL CARE, PLAINTIFF EXPERIENCED NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT, BARILY AUDIBLE, UNABLE TO STAND ON HIS KNEES RESTING ON THE BED PANTING, BEGGING FOR MEDICAL CARE, DUE TO CHRONIC AILMENTS (SEE 27 (1)(2)(4) ABOVE), DEFENDANT, PARK DECLARED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE

65. SAME EVENT: DEFENDANT, PARK WALKED AWAY LEAVING PLAINTIFF ON HIS KNEES BEGGING FOR MEDICAL CARE, WHICH DENIED PLAINTIFF MEDICAL CARE, VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION" UNDER THE EIGHTH AND FOURTEENTH AMENDMENTS

66. ON OR NEAR 6.12.14, DR. M. PARK, A.M. SICK CALL ON GA POD; PROVIDED MEDICAL CARE TO OTHER INMATES, DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS, WHERE PLAINTIFF EXPERIENCED NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT CAUSED BY CHRONIC AILMENT (SEE 27 (1)(2)(4) ABOVE).

67. SAME EVENT; DEFENDANT, PARK DECLARED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE, WALKED AWAY LEAVING PLAINTIFF IN AGONIZING PAIN, DENIED PLAINTIFF MEDICAL CARE, VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION" UNDER THE EIGHTH AND, FOURTEENTH AMENDMENTS

68. ON OR NEAR 6.13.14, DR. B. JIN, A.M. SICK CALL ON GA POD PROVIDED THE OTHER INMATES MEDICAL CARE; DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS, WHERE FOLLOWING A COLLAPSE, PLAINTIFF EXPERIENCED NON STOP EXCRUCIATING PAIN-N AMENDED COMPLAINT: 2:15-cv-1031 (22)

EXTREME DISCOMFORT CAUSED BY CHRONIC AILMENT (SEE 27(1)(2)(4) ABOVE), WHICH CAUSED

THE COLLAPSE, DEFENDANT, JIN, DECLARED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, THEN;

69. SAME EVENT; DEFENDANT, JIN, RESPONDED WITH DELIBERATE INDIFFERENCE TO PLAINTIFF BEING ON THE FLOOR STRUGGLING TO GET TO HIS FEET; DECLARED TO PLAINTIFF, "SHOW ME YOUR BLACK ASS, I WANT TO SEE YOUR ASS", MIMICKING KISSING PLAINTIFF.

70. SAME EVENT: DEFENDANT, JIN, WALKED AWAY AS PLAINTIFF WAS FALLING BACK TO THE FLOOR, IN A STATE OF NON STOP EXCRUCIATING PAIN-N-AGONY, STRUGGLING TO BREATHE, BEGGING FOR MEDICAL CARE, VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION" UNDER EIGHTH AND FOURTEENTH AMENDMENTS.

71. ON OR NEAR 6.23.14, DR. M. PARK, A.M., SICK CALL ON GA POD PROVIDED THE OTHER INMATES MEDICAL CARE; DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS; EXPERIENCING CHEST PAIN-N-STRUGGLING TO BREATHE; AND CHRONIC AILMENTS (SEE 27(1)(2)(4) ABOVE) CAUSING NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT; DEFENDANT, PARK STATED PLAINTIFF NEEDED IMMEDIATE MEDICAL EMERGENCY CARE, THEN

72. SAME EVENT, DEFENDANT, PARK RESPONDED WITH DELIBERATE INDIFFERENCE TO PLAINTIFF CHEST PAIN-N-STRUGGLE TO BREATHE; WALKED AWAY, LEAVING PLAINTIFF IN NON STOP AGONY, DENIED MEDICAL CARE, VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION" UNDER THE 8TH AND 14TH AMENDMENTS.

73. ON OR NEAR 6.26.14, DR. M. PARK, A.M., SICK CALL ON GA POD PROVIDED MEDICAL CARE TO THE OTHER INMATES; DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS; EXPERIENCING NON STOP EXCRUCIATING PAIN-N-DISCOMFORT, DUE TO CHRONIC AILMENTS, WHILE EXPLAINING HIS HEALTH PROBLEM TO DEFENDANT, PARK, PLAINTIFF COLLAPSED.

74. SAME EVENT, DEFENDANT, PARK DECLARED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE (SEE 27(1)(2)(4) ABOVE) WALKED AWAY LEAVING PLAINTIFF ~~LAYING~~ LYING FACE DOWN ON THE FLOOR, BASPING FOR ~~AIR~~ AIR, PLEADING FOR MEDICAL CARE, DENIED MEDICAL CARE, VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION" UNDER 8TH-N-14TH AMENDMENTS.

75. ON OR NEAR 6.27.14, DR. M. PARK, A.M., SICK CALL ON GD POD PROVIDED MEDICAL TO THE OTHER INMATES; DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS; EXPERIENCING NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT DUE TO CHRONIC

AILMENTS (SEE 27(I)(2)(4) ABOVE) TO THE EXTENT PLAINTIFF HAD TO USE THE WALL-N-DOOR FRAME TO REMAIN UPRIGHT; DEFENDANT, PARK DECLARED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE.

76. SAME EVENT: DEFENDANT, PARK WALKED AWAY LEAVING PLAINTIFF BEGGING FOR MEDICAL CARE WHILE IN NON STOP AGONY; DENIED MEDICAL CARE, VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION" UNDER 8th AND 14th AMENDMENTS

77. ON OR NEAR 7.11.14, DR-M. PARK, A.M. SICK CALL ON GA POD PROVIDED MEDICAL CARE TO THE OTHER INMATES; DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS; WHILE UNABLE TO STAND UPRIGHT, EXPERIENCING NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT CAUSED BY CHRONIC AILMENT (SEE 27(I)(2)(4) ABOVE); DEFENDANT, PARK DECLARED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE

78. SAME EVENT: DEFENDANT, PARK WALKED AWAY LEAVING PLAINTIFF CLINCHING TO WALLS-N-DOOR FRAME TO REMAIN UPRIGHT HAVING <sup>MOUTH</sup> AGAPEN TO BREATHE, PLEADING FOR MEDICAL CARE WHILE IN NON STOP AGONY; DENIED MEDICAL CARE, VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION", PER 8th-N-14th AMENDS

79. ON OR NEAR 7.14.14, DR. M. PARK, A.M. SICK CALL ON GA POD PROVIDED MEDICAL CARE TO THE OTHER INMATES; DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS, WHO COULD NOT STAND UPRIGHT; CHRONIC AILMENTS (SEE 27(I)(2)(4) ABOVE), IN NON STOP EXCRUCIATING PAIN AND EXTREME DISCOMFORT; DEFENDANT, PARK DECLARED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE

80. SAME EVENT, DEFENDANT, PARK WALKED AWAY LEAVING PLAINTIFF PANTING, STRUGGLING TO REMAIN UPRIGHT, IN NO STOP AGONY, AND BEGGING FOR MEDICAL CARE, DENIED MEDICAL CARE, VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION" UNDER 8th-N-14th AMENDMENTS

81. ON OR NEAR 7.18.14, DEFENDANT, M. PARK, A.M. SICK CALL ON GA POD PROVIDED MEDICAL CARE; DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASON, WHEN DR. PARK WITNESSED PLAINTIFF COLLAPSE WHILE EXPLAINING HIS CHRONIC AILMENTS CAUSING NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT (SEE 27(I)(2)(4) ABOVE)

DR. PARK DECLARED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, ~~AMENDED COMPLAINT: 2:15-CV-1031~~

THEN RESPONDED WITH DELIBERATE INDIFFERENCE.

82. SAME EVENT; DR. PARK WALKED AWAY LEAVING PLAINTIFF BEGGING HIM FOR MEDICAL CARE FOR PAIN, THOSE PLEAS FELL ON DEAF EARS, AS DR. PARK KEPT WALKING LEAVING ALONE ON HANDS-N-KNEES IN EXCRUCIATING PAIN-N-NON STOP AGONY, DENIED MEDICAL CARE, VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION" UNDER THE EIGHTH AND FOURTEENTH AMENDMENTS.

83. N. B. FOR THE SAKE OF PRESERVING SPACE THE COURT SHOULD INTERPRET PLAINTIFF ALLEGATIONS TO MEAN DEFENDANTS, M. PARK, E. MATTES, E. MWaura, B. JIN, P. DASCANI, M. COMER UNLESS STATED OTHERWISE, IN EACH RELATIVE INSTANCE, DECLARED "PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, THEN ACTED WITH DELIBERATE INDIFFERENCE."

84. ON OR NEAR 7.21.14, DR. M. PARK, A.M. SICK CALL ON GA POD, PROVIDED MEDICAL CARE TO THE OTHER INMATES, DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS, HAVING NO SIGHT IN RIGHT EYE (SEE 27 (1)(2)(4); 83 ABOVE), DRIPPING SEMEN, STRUGGLING TO BREATHE

85. SAME EVENT, DEFENDANT, PARK WALKED AWAY LEAVING PLAINTIFF UNABLE TO SEE OUT OF HIS RIGHT EYE, DRIPPING SEMEN, PANTING, BEGGING FOR MEDICAL CARE, WHILE IN NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT, DENIED MEDICAL CARE, VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION" UNDER 8TH, 14TH AMENDS.

86. ON OR NEAR 7.24.14, DR. M. PARK, A.M. SICK CALL ON GA POD PROVIDED MEDICAL CARE TO THE OTHER INMATES, DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS, SO WEAK BARELY ABLE TO STAND, STRUGGLING TO BREATHE, IN NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT DUE TO CHRONIC AILMENT (SEE 27(1)(2)(4); 83 ABOVE)

87. SAME EVENT, THE ACTIONS OF DEFENDANT, PARK IN WALKING AWAY AFTER HAVING WITNESS PLAINTIFF CLUTCHING HIS DOOR FRAME TO KEEP FROM FALL TO THE FLOOR DUE TO LACK OF STRENGTH WHILE IN NON STOP AGONY, DENIAL OF MEDICAL CARE VIOLATED PLAINTIFF RIGHTS TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION" UNDER EIGHTH-N-FOURTEENTH AMENDMENTS

88. ON OR NEAR 7.25.14, DR. PARK, A.M. SICK CALL ON GP POD PROVIDED MEDICAL CARE TO THE OTHER INMATES, DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS, WHOM DR. PARK DISCOVERED PLAINTIFF ON THE FLOOR TOO WEAK TO GET ON HIS FEET, IN NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT, DUE TO CHRONIC AILMENTS (SEE 27(1)(2)(4); 83 ABOVE)

89. SAME EVENT: DR. PARK ACTIONS IN DENIAL OF MEDICAL CARE, WALKING AWAY WHILE PLAINTIFF (AMPLIAZANT) 2:15-CV-1031 (25)

PLAINTIFF ON THE FLOOR, MOUTH AGAPED, STRUGGLING TO BREATHE-N-SPEAK IN NON STOP AGONY VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL AND UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION", UNDER THE EIGHTH AND FOURTEENTH AMENDMENTS

90. ON OR NEAR 8.7.14, DR. B. JIN, A.M. SICK CALL ON GA POD PROVIDED MEDICAL CARE TO THE OTHER INMATES; DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS; EXPERIENCING NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT DUE TO CHRONIC AILMENT (SEE ~~27(1)(3)(3); 83, ABOVE~~) TOO WEAK TO STAND <sup>UPRIGHT HAVING</sup> TO WALK BENDING AT THE WAIST TO COME TO DOOR WITH DR. JIN CONCERNING COMPLAINTS OF HEALTH

91. SAME EVENT, DEFENDANT, JIN INSTRUCTED PLAINTIFF TO REMOVE ALL CLOTHING, TO GET DOWN ON HIS KNEES AND SPREAD THE CHEEKS OF HIS BUTTOCKS; "OH! MAN, LOOK AT THAT PUSSY; STRUGGLING TO GET HIS CLOTHES BACK ON PLAINTIFF LOSS HIS BALANCE-N-FELL IN THE CORNER OF THE WALL-N-DOOR, DR. JIN SAID, "MY GOODNESS WHAT A GORGEOUS SHAPED ASS". I WILL PUT MY DICK IN YOUR ASSHOLE, AND YOU'LL BE JUST FINE."

92. SAME EVENT, DR. JIN ACTIONS OF WALKING AWAY LEAVING PLAINTIFF TOO WEAK TO PULL UP HIS JUMPSUIT, UNABLE TO STAND UPRIGHT, NEAR BLIND IN RIGHT EYE; BEGGING DR. JIN FOR MEDICAL CARE, IN NON STOP AGONY; DENIAL OF MEDICAL CARE, VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION" UNDER 8th-N-14th AMENDS.

93. ON OR NEAR 8.8.14, DR. M. PARK, A.M. SICK CALL ON GA POD, PROVIDED MEDICAL CARE TO THE OTHER INMATES, DENIED PLAINTIFF MEDICAL CARE BASED ON NON-MEDICAL REASONS; LYING AGAINST THE WALL, TOO WEAK TO STAND, STRUGGLING TO BREATHE, BEGGING FOR MEDICAL CARE, DUE TO CHRONIC (SEE 27(1)(3); 83; ABOVE) AILMENTS; EXPERIENCING NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT

94. SAME EVENT, DR. PARK ACTIONS OF DENIAL OF MEDICAL CARE, WALKING AWAY LEAVING PLAINTIFF BEGINS HIM FOR MEDICAL CARE, VIOLATED PLAINTIFF RIGHTS TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION" UNDER THE EIGHTH-N-FOURTEENTH AMENDMENTS.

95. ON OR NEAR 8.25.14, PAC. E. MATTES, A.M. SICK CALL ON GA POD PROVIDED MEDICAL CARE TO THE OTHER INMATES; DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS. EXPERIENCING NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT, CHRONIC AILMENTS (SEE 27(1)(2)(4), 83 ABOVE) TOO WEAK HE HAD TO CRAWL TO THE DOOR

96. SAME EVENT: THE ACTIONS OF ~~PAC. E. MATTES IN~~ HER WALKING AWAY LEAVING PLAINTIFF AMENDED COMPLAINT: 2:15-cv-1031

IFF IN NON STOP AGONY, TOO WEAK TO RISE TO HIS FEET, NEAR BLIND IN RIGHT EYE, STRUGGLING TO SPEAK-N-BREATHE, DENIAL OF MEDICAL CARE VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL AND UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION" UNDER 8TH-N-14TH AMENDS.

97. ON OR NEAR 9.8.14, PAC. E. MATTES, A.M. SICK CALL ON GA POD PROVIDED MEDICAL CARE TO THE OTHER INMATES, DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS, EXPERIENCING CHRONIC AILMENTS CAUSING NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT TO THE EXTENT PLAINTIFF WAS BENDING AT THE WAIST, GASPING FOR AIR (SEE 27(1)(2)(4); 83, ABOVE)

98. SAME EVENT, PAC E. MATTES ACTIONS OF WALKING AWAY LEAVING PLAINTIFF IN NON STOP PAIN AGONY BEGGING FOR PAIN MEDICINE, WHICH DENIED MEDICAL CARE VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION" UNDER 8TH-N-14TH AMENDMENTS.

99. ON OR NEAR 9.15.14, DR. M. PARK, A.M. SICK CALL ON GA POD PROVIDED MEDICAL CARE TO THE OTHER INMATES, DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS, CHRONIC AILMENT, EXPERIENCING NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT. DR. PARK, EXCLAIMED, HE WILL NOT GIVE PLAINTIFF MEDICAL CARE BECAUSE HE WANTED PLAINTIFF TO SUFFER

100. SAME EVENT, DR. PARK ACTIONS OF WALKING AWAY AS PLAINTIFF BEG FOR HIS MEDICAL CARE, HIS DESIRE TO SEE PLAINTIFF SUFFER, LEAVING PLAINTIFF HAVING TO REST ON ONE KNEE TO BREATHE, (SEE 27(1)(2)(4), 83 ABOVE) DENIAL OF MEDICAL CARE VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION" PER EIGHT-N-FOURTEENTH AMENDMENTS

101. ON OR NEAR 9.19.14, DR. P. DASCANI, A.M. SICK CALL ON GA POD PROVIDED MEDICAL CARE TO THE OTHER INMATES, DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS, EXPERIENCING NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT, DUE TO CHRONIC AILMENT, (SEE 27(1)(2)(4) 83 ABOVE) A LOSS OF EYESIGHT IN RIGHT EYE, UNABLE TO EAT WITHOUT EXPERIENCING A FIT OF DIARRHEA. DR. DASCANI, EXCLAIMED, "IT'S WASTE OF TIME FOR PLAINTIFF TO TELL HIM HIS MEDICAL NEEDS"

102. SAME EVENT, DR. DASCANI INSTRUCTED PLAINTIFF TO REMOVE ALL CLOTHING, TO GET ON HIS KNEES AND SPREAD THE CHEEKS OF HIS BUTTOCKS, DR. DASCANI EXCLAIMED, "OH! MAN LOOK AT THAT PUSSY, PLACE BOTH HANDS ON THE WALL, FEET WIDE APART, AND HOLD HIS BUTTOCKS OUT-N-UPWARD, NOW SHAKE THAT CHOCOLATE MAMA, OH WHAT A VOLUPTUOUS ASS," WHISPERED DR. DASCANI AS IF HE WAS IN A STATE OF PASSION

103. SAME EVENT, DR. DASCANI ACTIONS IN WALKING AWAY WHILE PLAINTIFF BEGGED FOR MEDICAL CARE, LEAVING PLAINTIFF IN NON STOP AGONY, DENIAL OF MEDICAL CARE, VIOLATED PLAINTIFF RIGHT AMENDED COMPLAINT: 2:15-CV-1031

TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION" UNDER 8TH-N-14TH AMENDS.

104. ON OR NEAR 9.22.14, DR. M. PARK, A.M. SICK CALL ON BA POD PROVIDED MEDICAL CARE TO THE OTHER INMATES; DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS. PLAINTIFF HAVING LOST EYESIGHT IN RIGHT EYE, EXPERIENCING NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT CAUSED BY CHRONIC AILMENTS (SEE 27(1)(2)(4), 83 ABOVE)

105. SAME EVENT: DR. PARK DENIED MEDICAL CARE, WALKED AWAY AS PLAINTIFF BEGGED FOR MEDICINE FOR PAIN, STRUGGLING TO BREATHE, NO SIGHT IN RIGHT EYE VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO EQUAL PROTECTION PER 8TH-14TH AMENDS

106. ON OR NEAR 9.26.14, DR. M. PARK, A.M. SICK CALL ON GA POD PROVIDED MEDICAL CARE TO THE OTHER INMATES; DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS, WITH A LOSS OF EYESIGHT IN RIGHT EYE, CHRONIC AILMENT (SEE 27(1)(2)(4), 83 ABOVE)

107. SAME EVENT: DR. PARK DENIED MEDICAL CARE, WALKED AWAY LEAVING PLAINTIFF BLIND IN RIGHT EYE, STRUGGLING TO STAND UPRIGHT, IN NON STOP PAIN-N-EXTREME DISCOMFORT, BEGGING DR. PARK FOR MEDICINE TO EASE THE PAIN VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO EQUAL PROTECTION PER 8TH-N-14TH AMENDS.

108. ON OR NEAR 9.29.14, DR. M. PARK, A.M. SICK CALL ON BA POD PROVIDED MEDICAL CARE TO THE OTHER INMATES; DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS, PERIODICALLY EXPERIENCING NO EYESIGHT IN RIGHT EYE AND CHRONIC AILMENT (SEE 27(1)(2)(4), 83), DEFENDANT, DR. PARK DECLARED, THEY COULD NOT PAY ME TO PROVIDE YOU MEDICAL CARE. WHEN PLAINTIFF TOLD DR. PARK HE COULD NOT AT ALL OUT OF HIS RIGHT EYE, DR. PARK LAUGHED UNCONTROLLABLY, STATED, "I AM GLAD"

109. SAME EVENT: DEFENDANT, PARK ACTIONS OF DENIAL OF MEDICAL CARE, WALKING AWAY LEAVING PLAINTIFF WITH LOSS OF EYESIGHT PERIODICALLY IN RIGHT EYE, UNABLE TO EAT WITHOUT EXPERIENCING A FIT OF DIARRHEA, IN NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT, BEGGING DR. PARK FOR MEDICAL CARE VIOLATED PLAINTIFF RIGHTS TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO EQUAL PROTECTION, UNDER EIGHTH-N-FOURTEENTH AMENDS.

110. ON OR NEAR 10.3.14, DR. M. PARK, A. M. SICK CALL ON BA POD PROVIDED MEDICAL CARE TO THE OTHER INMATES; DENIED PLAINTIFF BASED ON NON MEDICAL REASONS, DRIPPING SEMEN TO SUCH EXTENT PLAINTIFF PANT LEG WAS SOAKED WITH SEMEN AND DRIPPING INTO HIS SHOE, AND CHRONIC AILMENT (SEE 27(1)(2)(4), 83 ABOVE); DR. PARK RESPONDED, "I WISH YOU AMENDED COMPLAINT 2:15-CV-1031 (28)

"WOULD HURRY UP-N-DIE", "I WILL NOT GIVE YOU MEDICAL CARE", SPOKE OF GIVING PLAINTIFF A DEADLY DISEASE.

III. SAME EVENT: DR. PARK ACTIONS TO DENY MEDICAL CARE, WALKAWAY LEAVING PLAINTIFF SOAKED IN HIS OWN SEMEN FROM CROUCH DOWN HIS PANT LEG INTO HIS SHOE; UNABLE TO EAT WITHOUT EXPERIENCING A FIT OF DIARRHEA, NO EYE SIGHT IN RIGHT EYE, NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION" PER 8TH-N-14TH AMENDS.

112. ON OR NEAR 10.17.14, DR. M. PARK, A.M. SICK CALL ON GA POD PROVIDED MEDICAL CARE TO THE OTHER INMATES; DENIED PLAINTIFF MEDICAL CARE, UNABLE TO SEE OUT OF RIGHT EYE; AND CHRONIC AILMENT (SEE 27(1)(2)(4); 83 ABOVE) DEFENDANT, PARK, EXCLAIMED, "I KNOW YOU HAVE LIFE THREATING HEALTH PROBLEMS, BUT I DON'T GIVE A DAMN IF THEY CAUSE YOUR DEATH", "I WILL NOT PROVIDE YOU MEDICAL CARE" SO STOP ASKING, BASED ON NON MEDICAL REASONS

113. SAME EVENT: DEFENDANT, PARK ACTIONS TO WALK AWAY LEAVING PLAINTIFF IN NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT, BEGGING FOR PAIN MEDICINE, DENIED MEDICAL CARE VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION" UNDER THE EIGHTH-N-FOURTEENTH AMENDMENTS

114. ON OR NEAR 10.20.14, DR. M. PARK, A.M. SICK CALL ON GA POD PROVIDED MEDICAL CARE TO THE OTHER INMATES; DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS, NEAR BLIND IN RIGHT EYE, AND CHRONIC AILMENTS (SEE 27(1)(2)(4), 83 ABOVE)

115. SAME EVENT: DR. PARK ACTIONS TO DENY MEDICAL CARE, WALKED AWAY LEAVING PLAINTIFF BEAGING FOR MEDICINE TO EASE THE NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION" UNDER EIGHTH AND FOURTEENTH AMENDMENTS

116. ON OR NEAR 10.24.14, DR. P. DASCANI, A. M. SICK CALL ON GA POD PROVIDED MEDICAL CARE TO THE OTHER INMATES; DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS, UNABLE TO EAT, TOO WEAK TO STAND, AND CHRONIC AILMENTS. (SEE 27(1)(2)(3)(4); 83 ABOVE), DEFENDANT, DASCANI, EXCLAIMED, ASK ME AGAIN, AND AGAIN, I STILL WILL NOT PROVIDE YOU MEDICAL CARE

117. SAME EVENT: DR. DASCANI INSTRUCTED PLAINTIFF TO REMOVE ALL CLOTHING, TO GET ON HIS KNEES, DR. DASCANI SAID, "SHOW ME THAT ASS; OH, OH, WHAT A SHAPELY ASS", SPOKEN WITH EXCITEMENT AS HE RUBBED HIS PENIS . . . THIS IS SERIOUS PLAINTIFF SAID, "NO, YOU SHOW

THAT ASS", SNAPPED DR. DASCANI; PLAINTIFF SANKED TO THE FLOOR DUE TO HIS LACK OF STRENGTH, BEGGING DR. DASCANI FOR MEDICAL CARE, IN A NON STOP EXCRUCIATING PAIN-N-DISCOMFORT 118, SAME EVENT: DEFENDANT, DASCANI ACTIONS TO DENY MEDICAL CARE, WALK AWAY LEAVING PLAINTIFF ON THE FLOOR, NUDE, GASPING TO BREATHE, WEAK-N-DEHYDRATED VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION UNDER THE EIGHTH AND FOURTEENTH AMENDMENTS

119. ON OR NEAR 11.7.14, PAC, MS. E. MATTES, A. M., SICK CALL ON GA POD PROVIDED MEDICAL CARE TO THE OTHER INMATES; DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS UNABLE TO EAT WITHOUT CAUSING FITS OF DIARRHEA, WEAK-N-DEHYDRATED, AND CHRONIC AILMENTS (SEE 27(1)(3)(4); 83 ABOVE)

120, SAME EVENT: DEFENDANT, MATTES ACTIONS TO DENY MEDICAL CARE, WALK AWAY LEAVING PLAINTIFF IN NOT STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT, BEGGING PAC MATTES FOR MEDICINES TO EASE THE PAIN VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION" UNDER 8th-N-14th AMENDS.

121. ON OR NEAR 11.14.14, DR. M. PARK, A. M. SICK CALL ON GA POD PROVIDED MEDICAL CARE TO THE OTHER INMATES; DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS, TOE NAILS Oozing PUS-N-BLOOD, NEAR BLIND IN RIGHT EYE, AND CHRONIC AILMENTS. (SEE 27(1)(3)(4), 83 ABOVE) DEFENDANT, PARK STATED "YOU'RE SHIT OUT OF LUCK IF YOU ARE EXPECTING ME TO HELP YOU", "YOU CAN DIE FOR WHAT I CARE"

122. SAME EVENT: DEFENDANT, PARK ACTS OF DENIAL OF MEDICAL CARE, WALKING AWAY LEAVING PLAINTIFF BEGGING FOR MEDICINE FOR PAIN, WHILE IN NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION" UNDER EIGHTH AND FOURTEENTH AMENS

123. ON OR NEAR 11.24.14, DR. P. DASCANI, A. M. SICK CALL ON GA POD PROVIDED MEDICAL CARE TO THE OTHER INMATES; DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS, ANKLES SWOLLEN TO SUCH A DEGREE PLAINTIFF FORCED TO WALK WITH PAIN; AND CHRONIC AILMENT (SEE 27(1)(3)(4); 83 ABOVE)

124. SAME EVENT: DEFENDANT, DASCANI INSTRUCTED PLAINTIFF TO GET NAKED-N-HOLD HIS ASS HIGH IN THE AIR, DR. DASCANI PLACED HIS FACE AGAINST THE WINDOW, "COMPHED, AHED-N-OHO WHEEN

125. SAME EVENT: DEFENDANT, DASCANI ACTS THAT DENIED MEDICAL CARE, WALK AWAY LEAVING PLAINTIFF IN THE NUDE WITH ANKLES SWOLLEN TO NEAR TWICE THEIR SIZE MAKING IT PAINFUL TO STAND-N-TO WALK, IN NONSTOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT, BEGGING DR. DASCANI FOR MEDICINE TO EASE THE PAIN, VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION" PER 8TH, 14TH AMENDMENTS.
126. ON OR NEAR 12.9, 14, DR. M. PARK, A.M. SICK CALL ON GA POD PROVIDED MEDICAL CARE TO THE OTHER INMATES; DENIED PLAINTIFF MEDICAL CARE, DISCHARGE OF PUS-N-BLOOD FROM RIGHT EYE-N-LOSS OF EYESIGHT IN RIGHT EYE, AND CHRONIC AILMENT (SEE 27(1)(2)(4), 83 ABOVE)
127. SAME EVENT: DEFENDANT, PARK ACTIONS TO DENY MEDICAL CARE, WALK AWAY LEAVING PLAINTIFF WITH NO EYESIGHT WITH PUS-N-BLOOD DISCHARGING FROM RIGHT EYE, NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT, BEGGING DR. PARK FOR EYEDROPS WHICH HE DENIED VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT-N-TO "EQUAL PROTECTION" PER 8TH, 14TH AMENDMENTS
128. ON OR NEAR 12-10-14, PAC, MS. E. MWaura-N-E, MATTES, A.M. SICK CALL ON GA POD PROVIDED MEDICAL CARE TO THE OTHER INMATES; DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS, UNABLE TO SEE OUT OF RIGHT EYE DISCHARGING PUS-N-BLOOD, ANKLES SWOLLEN TO NEAR TWICE THEIR SIZE WHEN IN WALKING OR STANDING WAS PAIN, AND CHRONIC AILMENT (SEE 27(1)(2)(4), 83)
129. SAME EVENT: DEFENDANTS, ms. MWaura-N-MATTES DENIAL OF MEDICAL CARE, PAC, MWaura-N-E. MATTES, BOTH MADE THOSE DECISIONS; WALKED AWAY LEAVING PLAINTIFF IN EXCRUCIATING PAIN-N-EXTREME DISCOMFORT; DECLARED, "YOU THINK YOU'RE EXPERIENCING NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT NOW DUE TO INTESTINAL GRIPE-N-DIARRHEA, WAIT TO WE START; IGNORED PLAINTIFF REPEATED REQUEST FOR EYE DROPS-N-PAIN MEDICINES, WHICH WAS DENIED VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION" UNDER EIGHTH AND FOURTEENTH AMENDMENTS
130. ON OR NEAR 12.15,14, DR. M. PARK, A.M. SICK CALL ON GA POD PROVIDED MEDICAL CARE TO THE OTHER INMATES; DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS, LITTLE EYESIGHT IN RIGHT EYE DISCHARGING PUS-N-BLOOD, AND CHRONIC AILMENTS; DR. PARK DECLARED HE WOULDN'T PROVIDE MEDICAL CARE EVEN IF IT CAUSED PLAINTIFF DEATH (SEE 27(1)(2)(4), 83)
131. SAME EVENT: DEFENDANT, PARK DENIAL OF MEDICAL CARE, AND EYE DROPS-N-MEDICINE FOR PAIN WALKED AWAY LEAVING PLAINTIFF IN NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION" UNDER AMENDED COMPLAINT: 2:15-cv-1031 (31)

EIGHTH - N - FOURTEENTH AMENDMENTS  
 132. ON OR NEAR 12.17.14, PACS, MS. E, MATTES-N-MS. E, MWaura, AM, SICK CALL ON GA POD PROVIDED MEDICAL CARE TO THE OTHER INMATES; DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS,  
 PLAINTIFF EXPLAINED IN DETAIL-N-BEGGED PACS MATTES-N-MWaura NOT TO PRESCRIBE A DIET, WHICH  
 WHICH WOULD EXACERBATE PLAINTIFF INTESTINAL GRIPE, OUT  
 PLAINTIFF CONSENT PRESCRIBED THE DIET WHICH CAUSED PLAINTIFF TO EXPERIENCE AN EXACERBATED  
 INTESTINAL GRIPE-N-OCCURANCES OF VIOLENT DIARRHEA; AND CHRONIC AILMENTS (SEE 27(1)(2)(4) 83)

133. SAME EVENT: DEFENDANTS, MATTES-N-MWaura BOTH DECLARED, "WE KNOW YOU ARE CURRENTLY RECEIVING THE DIET WE PRESCRIBED FOR YOU THREE TIMES A DAY, YOU ARE EXPERIENCING EVEN MORE PAIN BECAUSE OF IT, THAT'S GOOD". . THAT WAS THE PURPOSE OF PRESCRIBING THIS PARTICULAR DIET FOR YOU"

134. SAME EVENT: DEFENDANTS, MATTES-N-MWaura ACTIONS TO PRESCRIBE A DIET PLAINTIFF BEGGED THEM NOT TO DO SO; AND BEGGED THEM TO STOP (SEE 27(3)) WALKED AWAY LAUGHING, LEAVING PLAINTIFF IN SO MUCH PAIN DUE TO THIS DIET, HE WAS UNABLE UPRIGHT HIMSELF, VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO EQUAL PROTECTION" PER 8TH, 14TH AMENDMENTS

135. ON OR NEAR 12.22.14, DR. P. DASCANI-N-PAC, MS. E, MWaura, 17, M, SICK CALL ON GA POD PROVIDED MEDICAL CARE; DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS, EXPERIENCING NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT. PLAINTIFF BEGGED FOR MEDICINE TO RELIEVE THE PAIN. DR. DASCANI-N-MWaura, DECLARED, "YEA, YOU NEED IMMEDIATE EMERGENCY MEDICAL CARE, SO WHAT, YOU WON'T GET ANY FROM US. (SEE 27(1)(2)(3)(4) 83, ABOVE)

136. SAME EVENT, DEFENDANTS, DR. DASCANI-N-PAC, MS. MWaura ACTS TO DENY MEDICAL CARE, LEAVING PLAINTIFF IN NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT, BOTH WALKED AWAY AS BOTH USED THE MIDDLE FINGER OF EACH HAND HIGH UP TO PLAINTIFF FACE, WITH A TWISTING MOTION VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO THE EQUAL PROTECTION" PER 8TH-N-14TH AMENDMENT

137. ON OR NEAR 12.23.14, DEFENDANTS, MS. E MWaura, PAC-N-B, JIN, DR. A:M, SICK CALL ON GA POD PROVIDED MEDICAL CARE TO THE OTHER INMATES; BUT DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASON, CHRONIC AILMENTS (SEE 27(1)(2)(3)(4) 83 ABOVE) DECLARED, "WHOOPEE DO, THEY KNEW PLAINTIFF WAS IN PAIN-N-SUFFERING, THAT IS EXACTLY WHAT THEY WANTED

138. SAME EVENT: DEFENDANTS, MR. JIAF-N-MS. MWaura A DENIAL OF MEDICAL CARE, WALKED AWAY WITH THE MIDDLE FINGER ON BOTH HAND HELD UP TO PLAINTIFF, DECLARED, ROTATE ON IT, LEAVING PLAINTIFF IN NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT, VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO EQUAL PROTECTION" PER 8TH-N-14TH AMENDMENTS.

139. ON OR NEAR 12.29.14, DR. M. PARK, A.M. SICK CALL ON GA POD PROVIDED MEDICAL CARE TO THE OTHER INMATES; DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS, WHO WHILE IN THE PROCESS OF BEGGING DR. PARK FOR MEDICINE FOR PAIN RELIEF PLAINTIFF COLLAPSED WITH DR. PARK LOOKING ON (SEE 27 (1)(3) (4), 83 ABOVE)

140. SAME EVENT: DEFENDANT, PARK DENIAL OF MEDICAL CARE, WALKED AWAY LEAVING PLAINTIFF IN NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT, SPRAWLED OUT ON THE FLOOR FACE DOWN GASPING FOR AIR, VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION" UNDER EIGHTH-N-FOURTEENTH AMENDMENTS

141. ON OR NEAR 12.30.14, DR. M. PARK, A.M. SICK CALL ON GA POD PROVIDED MEDICAL CARE TO THE OTHER INMATE; DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS; DUE TO LACK OF STRENGTH HAD TO COME TO HIS DOOR BY PLACING HIS HANDS ON THE WALL, AND CHRONIC AILMENT (SEE 27 (1)(2) (4), 83, ABOVE), WHEN DR. PARK WITNESS HOW PLAINTIFF MADE HIS WAY TO THE DOOR HE ASKED PLAINTIFF WAS HE CAPABLE <sup>TO</sup> DO SO WITHOUT PLACING HIS HANDS ON THE WALL, PLAINTIFF SAID NO, I AM TOO WEAK

142. SAME EVENT: DEFENDANT, PARK WHO DENIED MEDICAL CARE, WALKED AWAY LEAVING PLAINTIFF IN NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION" PER 8TH, 14TH AMENDS.

143. ON OR NEAR 1.7.15, DR. M. PARK, AM. SICK CALL ON GD POD PROVIDED MEDICAL CARE TO THE OTHER INMATES; DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS, BARELY ABLE TO WALK TO THE DOOR, DUE TO CHRONIC AILMENT (SEE 27 (1)(3) (4); 83 ABOVE)

144. SAME EVENT: DEFENDANT, PARK ACTS TO DENY MEDICAL CARE, WALK AWAY LEAVING PLAINTIFF IN NON STOP EXCRUCIATING PAIN -N-EXTREME DISCOMFORT, VIOLATED PLAINTIFF RIGHTS TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION" PER 8TH, 14TH AMENDS.

145. ON OR NEAR 1.8.15, DEFENDANT, DR. M. PARK, A.M. SICK CALL ON GA POD PROVIDED MEDICAL CARE TO THE OTHER INMATES; DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS, STRUGGLING TO BREATHE, UNABLE TO EAT WITHOUT INCURRING FITS OF VIOLENT DIARRHEA CAUSING NON STOP EXCRUCIATING PAIN -N-EXTREME DISCOMFORT, AND CHRONIC AILMENTS.

146. SAME EVENT, DR. PARK ACTS TO DENY MEDICAL CARE (SEE 27 (1)(2) (4); 83 ABOVE) WALK AWAY LEAVING PLAINTIFF IN NON STOP ABONY VIOLATED PLAINTIFF RIGHTS TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION" PER 8TH, 14TH AMENDS  
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147. ON OR NEAR 1, 14, 15, DR. M. PARK, A.M. SICK CALL ON GA POD PROVIDED MEDICAL CARE TO THE OTHER INMATES; DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS, UNABLE TO EAT WITHOUT INCURRING FITS OF VIOLENT DIARRHEA, AND CHRONIC AILMENTS CAUSING NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT (SEE 27(1)(2)(4), 83)
148. SAME EVENT, DEFENDANT, PARK, A.M. SICK CALL ACTS TO DENY MEDICAL CARE, WALK AWAY LEAVING PLAINTIFF IN NON STOP AGONY, VIOLATED PLAINTIFF RIGHTS TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION" UNDER 8TH-N-14TH AMENDS.
149. ON OR NEAR 1, 21, 15, PAC. MS. E. MWaura, A. M. SICK CALL ON GA POD PROVIDED MEDICAL CARE TO THE OTHER INMATES; DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS, EXPERIENCING NON STOP EXCRUCIATING PAINFUL INTESTINAL GRIPE MAKING SLEEP NEAR NON EXISTENTIAL FOR PAST FOUR STRAIGHT DAYS, PAIN SO GREAT PLAINTIFF HAD DIFFICULTY STANDING WITHOUT THE AID OF LEANING AGAINST THE DOOR OR THE WALL; AND CHRONIC AILMENT (SEE 27(1), (2)(4), 83)
150. SAME EVENT, PAC. MWaura WAS ASKED BY PLAINTIFF TO GIVE HIM MEDICINE FOR PAIN, PAC. MWaura RESPONSE WAS TO: LAUGH, THEN SAID, YOU ARE IN PAIN, AND I'M GLAD OF IT.
151. SAME EVENT: DEFENDANT, PAC. MWaura, ACTS TO DENY MEDICAL CARE, MEDICINE, WALK AWAY AS SHE RAISE (SEE 27(3)) THE MIDDLE FINGER OF BOTH HANDS LEAVING PLAINTIFF IN NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT VIOLATED PLAINTIFF RIGHTS TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION" PER 8TH, 14TH AMENDS.
152. ON OR NEAR 1, 28, 15, PAC. E. MWaura, A. M. SICK CALL ON GA POD PROVIDED MEDICAL CARE TO THE OTHER INMATES; DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS, WITH TOE NAILS DOZING PUS-N-BLOOD TO SUCH EXTENT IT STAINED THROUGH SOCK-N-SNEAKERS, AND CHRONIC AILMENTS CAUSING NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT (SEE 27(1) (2)(4), 83)
153. SAME EVENT: PAC. MWaura ACT OF DENYING MEDICAL CARE, WALK AWAY WITH THE MIDDLE FINGER OF BOTH HANDS ~~Raised~~ LEAVING PLAINTIFF WITHOUT MEDICINE FOR PAIN, AND INFECTED TOE NAILS, VIOLATED PLAINTIFF RIGHTS TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION" UNDER EIGHTH-N-FOURTEENTH AMENDMENTS.
154. ON OR NEAR, 3, 4, 15, PAC. MS. E. ~~MWaura~~, A. M. SICK CALL ON GA POD PROVIDED MEDICAL CARE TO THE OTHER INMATES; DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS, EXPERIENCING NON STOP EXCRUCIATING PAINFUL INTESTINAL GRIPE TO SUCH A DEGREE PLAINTIFF WAS FORCED TO WALK BENDING AT THE WAIST, AND CHRONIC AILMENTS
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WHILE SHARING THIS INFORMATION WITH PAC MATTES PLAINTIFF COLLAPSES, SO SHE WITNESSED IT, UNFOLD, PLAINTIFF EXPERIENCED NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT.

155. SAME EVENT: PAC, MS. MATTES ACTS DENYING MEDICAL CARE, MEDICINE FOR PAIN, WALKING AWAY LEAVING PLAINTIFF IN SOMUCH ~~PAIN~~ NON STOP PAIN PLAINTIFF WAS UNABLE TO STAND WITHOUT BENDING AT THE WAIST, AND UNABLE TO EAT WITHOUT INCURRING DIARRHEA VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION UNDER EIGHTH AND FOURTEENTH AMENDMENTS. (SEE 27 (1)(2)(4), 83 ABOVE)

156. ON OR NEAR 2.18.15, PAC, MS. E. MATTES, A. M. SICK CALL ON 8A POD PROVIDED MEDICAL CARE TO THE OTHER INMATES; DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASON, BLIND IN RIGHT EYE, UNCHAINED DIARRHEA, NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT, AND CHRONIC AILMENT, (SEE 27 (1)(2)(3)(4), 83 ABOVE) DEFENDANT, MS. MATTES DECLARED

157. SAME EVENT: SHE WANTED PLAINTIFF TO CONTINUE EXPERIENCING PAIN, BEGIN LAUGHING UNCONTROLLABLY, YES, YOU'RE IN PAIN, THAT'S WHAT I WANT IS YOU SUFFERING IN UNREMITTING PAIN, DEFENDANT, MATTES SHOUTED, I WILL SEE TO IT THAT YOU CONTINUE TO BE IN PAIN, SHE DECLARED

158. SAME EVENT: DEFENDANT, MS. MATTES ACTS TO DENY MEDICAL CARE, WALKED AWAY HOLDING THE MIDDLE FINGER OF BOTH HAND, VIOLATED PLAINTIFF RIGHTS TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION" UNDER EIGHTH-N-FOURTEENTH AMENDMENTS

159. ON OR NEAR 2.23.15, PAC, MS. E. MWAWURA, A. M. SICK CALL ON 8A POD PROVIDED MEDICAL CARE TO THE OTHER INMATES; DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS, NON STOP PAIN THROUGHOUT HIS DIGESTIVE TRACT, AND CHRONIC AILMENTS

160. SAME EVENT: DEFENDANT, MS. MWAWURA ACTIONS OF DECLARING TO PLAINTIFF, "YOU CAN DIE FOR WHAT I CARE," "I'M GLAD YOU'RE IN PAIN (SEE 27 (1)(2)(3)(4), 83 ABOVE, REPEATEDLY PLAINTIFF REQUESTED MEDICINE FOR PAIN; DEFENDANT, MS. MWAWURA DENIED MEDICAL CARE, EXTENDING THE MIDDLE FINGER OF BOTH HANDS; WALKED AWAY LEAVING PLAINTIFF IN NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT, VIOLATED PLAINTIFF RIGHTS TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT PER 8TH, 14TH AMENDMENTS

161. ON OR NEAR 3.3.15, PAC, MS. E. MATTES, A. M. SICK CALL ON 8A POD PROVIDED MEDICAL CARE TO THE OTHER INMATES, DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS, STRUGGLING TO BREATHE-N-CHEST PAIN, AND CHRONIC AILMENT (SEE 27 (1)(2)(3)(4), 83 ABOVE), EXPERIENCING NON STOP EXCRUCIATING ~~PAIN~~ PAIN-N-EXTREME DISCOMFORT

162. SAME EVENT: DEFENDANT, MS. MATTES ACTS TO DENY MEDICAL CARE, WALK AWAY AMENDED COMPLAINT 2:15-cv-1031 (35)

HOLDING UP THE MIDDLE FINGER OF EACH IN PLAINTIFF FACE VIOLATED PLAINTIFF RIGHTS TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO EQUAL PROTECTION, PER 8TH, 14TH AMENDMENTS.

163. ON OR NEAR 3.17.15, PAC, MS. MATTES A.M. SICK CALL ON GA POD PROVIDED MEDICAL CARE TO THE OTHER INMATES; DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS, HAVING PAINFUL INTESTINAL GRIPE SO INTENSE IT AWAKEN PLAINTIFF FROM HIS SLEEP, AND CHRONIC AILMENTS, CAUSING NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT.

164. SAME EVENT: DEFENDANT, MS. MATTES RESPONSES, "YOU CAN'T SLEEP DUE TO PAIN, OH! I LOVE IT" PLAINTIFF REQUESTED MEDICINE FOR PAIN RELIEF, DEFENDANT, MATTES RESPONDED (SEE 27(1)(2)(3)(4), 83 ABOVE) BY HOLDING THE MIDDLE FINGER OF BOTH HANDS UP, SCREAM TO PLAINTIFF, "SIT ON IT AND ROTATE", WALKED AWAY LEAVING PLAINTIFF IN UNREMITTING PAIN, DENIED MEDICAL CARE VIOLATING PLAINTIFF RIGHTS TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO EQUAL PROTECTION, PER 8TH, 14TH AMENDMENTS.

165. ON OR NEAR 3.31.15, PAC, MS. E. MATTES, A.M. SICK CALL ON GA POD PROVIDED MEDICAL CARE TO THE OTHER INMATES, DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS, CHRONIC AILMENTS CAUSING NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT.

166. SAME EVENT: DEFENDANT, MATTES ACTS OF DENIAL OF MEDICAL CARE, HELD UP THE MIDDLE FINGER OF BOTH HANDS, SHOUT, "GET ON IT" (SEE 27(1)(2)(3)(4), 83, ABOVE) LEAVING PLAINTIFF TOO WEAK TO STAND UPRIGHT, WALKED AWAY, VIOLATED PLAINTIFF RIGHTS TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO EQUAL PROTECTION UNDER 8TH AND 14TH AMENDMENTS.

167. ON OR NEAR 4.6.15, PAC, MS. E. MWaura A.M. SICK CALL ON GA POD PROVIDED MEDICAL CARE TO THE OTHER INMATES; DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS, EXPERIENCING DIFFICULTY SLEEPING PAST FOUR STRAIGHT DAYS DUE TO NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT OF A INTESTINAL GRIPE TO SUCH DEGREE HE COULD ONLY STAND BENDING AT THE WAIST; AND CHRONIC AILMENTS (SEE 27(1)(2)(3)(4), 83 ABOVE)

168. SAME EVENT: DEFENDANT, MS. MWaura ACTS TO DENY MEDICAL CARE, BEGIN LAUGHING, THEN PROCLAIM, THAT'S EXACTLY WHAT I WANT YOU TO EXPERIENCE, IS PAIN! I WANT YOUR ASSHOLE TO DROP OUT, WALKED AWAY LEAVING PLAINTIFF IN UNREMITTING PAIN, VIOLATED PLAINTIFF RIGHTS TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO EQUAL PROTECTION PER 8TH-N-14TH AMENDS.

169. ON OR NEAR 4.21.15, PAC, MS. E. MWaura A.M. SICK CALL ON GA POD PROVIDED MEDICAL CARE TO THE OTHER INMATES; DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS, WHO'S ANKLES SWOLLEN TO SUCH DEGREE PLAINTIFF WAS FORCED TO WALK WITH PAIN-N-ONLY STAND AMENDED COMPLAINT: 2:15-CV-1031 (36)

SHORT SPURTS; AND CHRONIC AILMENTS (SEE 27 (1)(2)(3)(4), 83 ABOVE)-

170. SAME EVENT: DEFENDANT, MWAWURA RESPONSE, "IT'S GOOD TO KNOW YOU'RE IN PAIN", THAT MAKES MY DAY". PLAINTIFF REQUESTED MEDICINE TO RELIEVE THE PAIN, DEFENDANT, MWAWURA RESPONDED BY HOLDING UP THE MIDDLE FINGER OF BOTH HANDS, TOLD PLAINTIFF TO "SIT ON IT", THEN WALKED AWAY, HAVING DENIED MEDICAL CARE, WHICH VIOLATED PLAINTIFF RIGHTS TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO EQUAL PROTECTION" PER 8TH, 14TH AMENDS.

171. ON OR NEAR 5.12.15, PAC. E. MATTIES, A.M. STICK CALL ON GA POD PROVIDED MEDICAL CARE TO THE OTHER INMATES; DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS, WITH PLAINTIFF RIGHT EYE DISCHARGING PUS-N-BLOOD RENDERING PLAINTIFF WITH NO SIGHT IN RIGHT EYE; AND CHRONIC AILMENTS (SEE 27 (1)(2)(3)(4), 83 ABOVE)

172. SAME EVENT: DEFENDANT, MATTIES STATED TO PLAINTIFF, "SHE COULDN'T CARE LESS ABOUT HIS RIGHT EYE DISCHARGING PUS-N-BLOOD, -N-HIS LOSS OF EYESIGHT IN THE RIGHT EYE, AND PLAINTIFF SHOULD BE BLIND IN BOTH EYES", WHEN PLAINTIFF REQUESTED EYEDROPS DEFENDANT, MATTIES USING THE MIDDLE FINGER ON BOTH HANDS, AND SAID TO PLAINTIFF "THESE ARE FOR YOU", WALKED AWAY LEAVING PLAINTIFF WITH RIGHT EYE DISCHARGING PUS-N-BLOOD, AND LOSS OF SIGHT; DENIED MEDICAL CARE; VIOLATED PLAINTIFF RIGHTS TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO EQUAL PROTECTION" PER 8TH, 14TH AMENDS,

173. ON OR NEAR 5.26.15, PAC. E. MATTIES A.M. STICK CALL, GA POD PROVIDED MEDICAL CARE TO THE OTHER INMATES; DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASON, WHILE DRIPPING SEMEN TO SUCH DEGREE THE CROUCH OF PLAINTIFF JUMP SUIT-N-DOWN THE FRONT OF EACH LEG WERE SOAKED IN SEMEN, AND CHRONIC AILMENTS (SEE 27 (1)(2)(3)(4), 83 ABOVE)

174. SAME EVENT, DEFENDANT, MATTIES ACTS, i.e. DENIAL OF MEDICAL CARE; WHEN PLAINTIFF REQUESTED MEDICINES TO PUT A STOP TO HIS DRIPPING SEMEN DEFENDANT, MATTIES DECLARED, "SHE WANTED PLAINTIFF PENIS TO ROT-N-FALL OFF", THEN HELD UP THE MIDDLE FINGER OF BOTH HAND, WALKED AWAY LEAVING PLAINTIFF IN NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT, CONTINUOUS DRIPPING SEMEN NONSTOP; VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO EQUAL PROTECTION PER 8TH, 14TH AMENDMENTS

175. ON OR NEAR 6.9.16, PAC. E. MATTIES A.M. STICK CALL ON GA POD PROVIDED MEDICAL CARE TO THE OTHER INMATES; DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS, CONCERNING CHRONIC AILMENTS (SEE 27 (1)(2)(3)(4), 83 ABOVE) CAUSING NONSTOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT,

176. SAME EVENT; DEFENDANT MATTIES ACTS, i.e. DENIED MEDICAL CARE, WALKED AWAY WITH THE MIDDLE FINGER OF BOTH HAND HELD HIGH, YELLED TO PLAINTIFF "ROTATE ON IT"; VIOLATED PLAINTIFF AMENDED COMPLAINT: 2-15-cv-1031

RIGHTS TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO EQUAL PROTECTION, PER 8TH, 14TH AMENDS,

177. ON OR NEAR 6, 24, 15, PAC, E. MWAURA, A. M. SICK CALL ON GA POD PROVIDED MEDICAL CARE TO THE OTHER INMATES; DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS, CONCERNING CHRONIC AILMENT (SEE 27 (1)(2)(3)(4), 83 ABOVE) CAUSING NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT.

178. SAME EVENT: DEFENDANT, MWAURA ACTIONS IN DENYING MEDICAL CARE, WALKED AWAY WITH THE MIDDLE FINGER OF BOTH HANDS HELD HIGH, AND YELLED "SIT ON IT", VIOLATED PLAINTIFF RIGHTS TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO EQUAL PROTECTION, PER 8TH, 14TH AMENDS.

179. ON OR NEAR 7, 8, 15, PAC MS, E. MWAURA, A. M. SICK CALL ON GA POD PROVIDED MEDICAL CARE TO THE OTHER INMATES; DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS, EXPERIENCING EXCRUCIATING PAIN-N-EXTREME DISCOMFORT CAUSED BY CHRONIC AILMENTS.

180. SAME EVENT: DEFENDANT, MWAURA, PAC ACTIONS IN DENIAL OF MEDICAL CARE (SEE 27 (1)(2)(3)(4), 83 ABOVE), WALKED AWAY WITH THE MIDDLE FINGER ON BOTH HAND HELD UP FOR PLAINTIFF TO SEE, LEAVING PLAINTIFF IN NON STOP AGONY VIOLATED PLAINTIFF RIGHTS TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO EQUAL PROTECTION PER 8TH, 14TH AMENDMENTS.

181. DURING THE TIME SPAN OF SEPTEMBER 2013 THROUGH DECEMBER 2013, DEFENDANT, P. DENNISON, G-BLOCK OFFICER SERVED BREAKFAST EACH MORNING HE WORKED TO THE OTHER INMATES ON BD POD UNTAMPERED DENIED PLAINTIFF A UNTAMPERED BREAKFAST, WHEREBY BASED ON NON PENALOGICAL REASONS DEFENDANT, DENNISON WOULD TAKE PLAINTIFF BREAKFAST TRAY FLIPPING-N-TURNING OVER SEVERAL TIMES CAUSING ALL THE FOODS TO MIX TOGETHER, WHICH CAUSED PLAINTIFF TO EXPERIENCE EXCRUCIATING PAINFUL INTESTINAL GRIPE THAT CONTINUED FOR 4-6 HOURS (SEE 27 (4)), DEFENDANT, DENNISON ACTIONS VIOLATED PLAINTIFF EIGHTH AMENDMENT, CONCERNING CRUEL-N-UNUSUAL PUNISHMENT; RIGHT TO EQUAL PROTECTION, 14TH AMENDMENT.

182. SEPTEMBER - THROUGH - DECEMBER 2013, DEFENDANT, P. DENNISON, G-BLOCK OFFICER SERVING NOON MEAL ON BD POD EACH DAY HE WORKED PROVIDED THE OTHER INMATES UNTAMPERED FOOD; DENIED PLAINTIFF UNTAMPERED FOOD BASED ON NON PENALOGICAL REASONS.

183. SAME EVENT: DEFENDANT, DENNISON FLIPPED-N-TURNED THE TRAY SEVERAL TIME CAUSING ALL THE FOOD TO MIX TOGETHER, WHICH CAUSED PLAINTIFF TO EXPERIENCE EXCRUCIATING PAINFUL INTESTINAL GRIPE THAT CONTINUED 4-6 HOURS. DEFENDANT, DENNISON ACTS VIOLATED PLAINTIFF RIGHT TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO EQUAL PROTECTION, PER 8TH-N-14TH AMENDMENT COMPLAINT: 2:15-CV-1031

184. ON OR NEAR 8.1.13, DEFENDANTS, J.M. SMITH, G BLOCK SERGEANT; T.S. OSWALD, G BLOCK OFFICER, ESCORTING INMATES TO THEIR VISIT, ESCORT THE OTHER INMATES WITHOUT VIOLATING THAT INMATES SAFETY; BUT DENIED PLAINTIFF SAFETY WHILE BEING ESCORTED TO A VISIT BASED ON NON PENALOGICAL REASONS; CAME TO PLAINTIFF, GD 3, WHILE PLAINTIFF WAS HAVING A BOWEL MOVEMENT.

185. SAME EVENT, DEFENDANTS, SMITH-N-OSWALD ACTION TO GIVE PLAINTIFF A DIRECT ORDER TO REMOVE HIMSELF FROM THE COMMODE WITHOUT CLEANING HIMSELF, REMOVE ALL OF HIS CLOTHING ELSE THEY WERE GOING TO DENY PLAINTIFF HIS LEGAL VISIT. DEFENDANTS, SMITH-N-OSWALD BOTH INSTRUCTED PLAINTIFF LIE FACE DOWN ON THE FLOOR-N-SPREAN THE CHEEK OF HIS BUTTOCK, THEN SHAKE HIS ASS; VIOLATED PLAINTIFF RIGHTS TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION" UNDER 8th and 14th AMENDMENTS; OCCURRED DURING THE A.M.

186. ON OR NEAR 8.1.13, DEFENDANTS, J.M. SMITH - T.S. OSWALD, G BLOCK SERGEANT-N-OFFICER WHILE ESCORTING PLAINTIFF TO A LEGAL VISIT DENIED PLAINTIFF RIGHT TO SAFETY BASED ON NON PENALOGICAL REASON, WHERE DEFENDANT, OSWALD BEGIN MASSAGING PLAINTIFF ARM AS HE MIMICKED SOUNDS OF A WOMAN EXPERIENCING AN ORGASM, PRESSING HIS ERECT PENIS ON PLAINTIFF THIGH, PLAINTIFF ASKED HIM TO STOP.

187. SAME EVENT, DEFENDANT, SMITH REPEATEDLY JABBED THE END OF HIS NIGHT STICK BETWEEN THE CLEavage- OF PLAINTIFF BUTTOCK. DEFENDANTS, SMITH-N-OSWALD CONTINUOUSLY REFERRED TO PLAINTIFF AS HONEY, SWEETHEART, BABY. PLAINTIFF ASKED DEFENDANT, SMITH TO STOP TOUCHING HIM WITH THE STICK. DEFENDANTS, SMITH-N-OSWALD ACTS VIOLATED PLAINTIFF RIGHTS TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO EQUAL PROTECTION" UNDER THE EIGHT-N-FOURTEENTH AMENDMENTS, OCCURRED IN A.M.

188. ON OR NEAR 12.17.13, DEFENDANT, R. NELSON, RHU OFFICER, ASSIGNED TO DIFFERENT BLOCK CAME TO PLAINTIFF CELL, GD-3; UNREQUESTED. GAVE PLAINTIFF DIRECT ORDERS TO REMOVE ALL OF HIS CLOTHING, PLAINTIFF COMPLIED. DEFENDANT, NELSON SAID WITH EXCITEMENT IN HIS VOICE, "OH, WHAT A VOLUPTUOUS ASS SWEETHEART". THE ORDER WERE NOT BASED ON PENALOGICAL REASONS. OCCURRED DURING DEFENDANT, NELSON ACTIONS VIOLATED PLAINTIFF RIGHTS TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION" UNDER THE EIGHTH-N-FOURTEENTH AMENDMENTS

189. ON OR NEAR 1.14.14, DEFENDANT, J. D. SUHAN, RHU OFFICER, ASSIGNED TO DIFFERENT BLOCK CAME TO PLAINTIFF CELL, GD-3, UNREQUESTED, DURING THE A.M.; BASED ON NON PENALOGICAL REASONS. DEFENDANT, SUHAN GAUE PLAINTIFF DIRECT ORDERS TO REMOVE ALL OF HIS CLOTHING, TURN HIS BACK TO DEFENDANT, SUHAN; TO MAKE HIS BUTTOCK JUMP, GET ON HIS KNEES-N-USE BOTH HAND TO SPREAD THE CHEEKS OF HIS BUTTOCK. DEFENDANT, SUHAN CONTINUOUSLY SIGHED, OOH WEED, AHED

BREATHING HARD. THE ENTIRE TIME REFERRED TO PLAINTIFF AS DARLING, SUGAR, HONEY. 190. SAME EVENT. DEFENDANT, SUHAN SAID HE WANTED TO LATER FANTASIZE ABOUT HAVING SEX WITH PLAINTIFF WHILE PLAINTIFF IS ON HIS KNEES USING BOTH HANDS TO SPREAD THE CHEEKS OF HIS BUTTOCK; SO THIS WOULD GIVE HIM A CLEAR VIEW OF PLAINTIFF RECTUM.

191. SAME EVENT: DEFENDANT, SUHAN WALKED AWAY LEAVING PLAINTIFF NUDE, STILL ON HIS KNEES POSITIONING HIS BUTTOCK FOR DEFENDANT, SUHAN TO OBTAIN HIS MOST DESIRED VIEW OF PLAINTIFF RECTUM, WHICH VIOLATED PLAINTIFF RIGHTS TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION" PER 8TH, 14TH AMENDMENTS.

192. ON OR NEAR 4.2.15, SERGEANT, T.S. OSWALD, P.M., ESCORTING PLAINTIFF FROM SHOWER TO HIS CELL, DENIED PLAINTIFF SAFETY BASED ON NON PENALOGICAL INTEREST, WHILE PROVIDING THE OTHER INMATES SAFETY WHILE ESCARTED FROM THE SHOWER. DEFENDANT, OSWALD SQUEEZED PLAINTIFF ARM AS PLAINTIFF WAS ABOUT TO ENTER HIS CELL, RUB-N-MASSAGED, WHILE MIMICKING SOUNDS OF A FEMALE EXPERIENCING A ORGASM, REFERRING TO PLAINTIFF AS CHOCOLATE CAKES, SQUEEZED PLAINTIFF BUTTOCK, STATED, SOFT AS COTTON; PLAINTIFF ASKED DEFENDANT, OSWALD TO KEEP HIS HANDS OFF OF HIM, DEFENDANT, OSWALD ACTIONS VIOLATED PLAINTIFF RIGHTS TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION" PER 8TH, 14TH AMENDS.

193. ON OR NEAR 7.14.15, DEFENDANTS, D. FARRIER-N-M, STUMP, BOTH RHU OFFICER, 10-6 SHIFT, ESCORTED INMATES SAFELY TO R-N-D, DENIED PLAINTIFF SAFETY BASED ON NON PENALOGICAL INTEREST. DEFENDANTS, FARRIER-N-STUMP, EACH HOLDING A DIFFERENT ARM, BOTH BEATING RAB PLAINTIFF ARMS, MASSAGING MIMICKING SOUNDS OF A WOMAN EXPERIENCING A ORGASM. PLAINTIFF ASKED THEM TO STOP

194. SAME EVENT: BOTH DEFENDANTS, FARRIER-N-STUMP REFERRING TO PLAINTIFF AS DARLING-N-HONEY-BUNCH, CAUSING THEIR ERECT PENIS TO MAKE CONTACT WITH PLAINTIFF BODY, THE ACTIONS OF DEFENDANTS FARRIER-N-STUMP VIOLATED PLAINTIFF RIGHTS TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION" UNDER THE EIGHTH AND FOURTEENTH AMENDMENTS,

195. DURING AUGUST 2013 - AUGUST 2015, MS. I. VILHEDAL, H.R. A.M. INTERVIEW, ON 3-SF PARTIE OCCASIONS DEFENDANT, VILHEDAL SUMMONED PLAINTIFF, TWICE PLAINTIFF WITH THE AID OF RHU STAFF, ONCE RIOT BY CHARGIN PUS-N-BLOOD, NO EYESIGHT, AND INTENSE CHEST PAIN, ONCE UNABLE TO STAND UPRIGHT-N-STRUGGLING TO BREATHE. BASED ON NON MEDICAL REASONS (SEE 27(1)(2)(3) ABOVE) PLAINTIFF NEEDS WERE DENIED, EACH TIME DEFENDANT VILHEDAL HELD IN HAND COPIES OF PLAINTIFF GRIEVANCES CONCERNING A DENIAL MEDICAL CARE. DEFENDANT, VILHEDAL WALKED AWAY WITH THE MIDDLE FINGER OF BOTH HANDS HELD UP, STATED BET ON THIS, WHICH VIOLATED PLAINTIFF RIGHTS TO BE FREE OF CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION" UNDER 8TH AND 14 AMENDMENTS, "DENIAL OF MEDICAL CARE".

196. DURING AUGUST 2013 - JULY 2015 R. GILMORE, WARDEN, RHU, EVERY 90-DAYS PLAINTIFF WAS SUMMONED, MORE THAN ONE PLAINTIFF WAS AID BY STAFF, OUT TO (SEE 27 (1)(2)(3) ABOVE) "MEDICAL NEEDS, ONCE PLAINTIFF COLLAPSED, THESE INTERVIEWS CONCERNED GRIEVANCE DEFENDANT, GILMORE HELD IN HAND CONCERNING THE ISSUES ALLEGED IN THIS AMENDED COMPLAINT, PP. 1-40, AND APPENDICES. DEFENDANT GILMORE WALKED AWAY LEAVING PLAINTIFF ON THE FLOOR, ONCE OTHERTIMES HE HELD THE MIDDLE FINGER UPON BOTH HAND, SAID THIS IS FOR YOU, DEFENDANT, GILMORE ACTIONS VIOLATED PLAINTIFF RIGHTS TO CRUEL-N-UNUSUAL PUNISHMENT, AND TO "EQUAL PROTECTION": DENIAL OF MEDICAL CARE, BASED ON NON PENALOGICAL INTEREST AMENDED COMPLAINT: 2:15-CV-1031